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12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 STEPHANIE CLIFFORD a.k.a.
15 STORMY DANIELS a.k.a. PEGGY
16 PETERSON, an individual,

17 Plaintiff,

18 v.

19 DONALD J. TRUMP a.k.a. DAVID
20 DENNISON, an individual,
21 ESSENTIAL CONSULTANTS, LLC,
22 a Delaware Limited Liability
23 Company,
24 MICHAEL COHEN, an individual, and
25 DOES 1 through 10, inclusive,

26 Defendants.

Case No. 2:18-CV-02217-SJO-FFM

**SUPPLEMENTAL
DECLARATION OF BRENT
H. BLAKELY IN SUPPORT
OF DEFENDANT MICHAEL
COHEN'S SPECIAL MOTION
TO STRIKE**

Assigned to the Hon. S. James Otero
Action Filed: March 6, 2018

Date: December 3, 2018
Time: 10:00 a.m.
Location: 350 West 1st Street
Courtroom 10C, 10th Floor
Los Angeles, CA 90012

DECLARATION OF BRENT H. BLAKELY

I, Brent H. Blakely, declare:

1. I am an attorney duly licensed to practice before all courts of the State of California and in the U.S. District Court for the Central District of California, among other courts. I am a partner of the law firm of Blakely Law Group, counsel of record for Defendant Essential Consultants LLC and Michael Cohen. I make this declaration based on my own personal knowledge and, if called and sworn as a witness, I could and would competently testify hereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of this Court's ruling dated October 15, 2018 granting Donald Trump's Motion to Strike in *Clifford v. Trump*, USDC Cent. Dist. California, case no. 18-06893.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Complaint in *Clifford v. Davidson*, Superior Court of the State of California, Case no. SC129384.

4. Attached hereto as **Exhibit C** is a true and correct copy of the IMDB profile of Stormy Daniels, which can be found at <https://www.imdb.com/name/nm1317917/>

5. Attached hereto as **Exhibit D** is a true and correct copy of the Wikipedia profile of Stormy Daniels, which can be found at https://en.wikipedia.org/wiki/Stormy_Daniels

6. Attached hereto as **Exhibit E** is a true and correct copy of the Wikipedia profile of Wicked Pictures, which can be found at https://en.wikipedia.org/wiki/Wicked_Pictures

7. Attached hereto as **Exhibit F** is a true and correct copy of an article from NBC News entitled West Hollywood Celebrates 'Stormy Daniels Day,' Gives her key to City, which can be found at <https://www.nbclosangeles.com/news/local/Stormy-Daniels-Day-West-Hollywood-Trump-Stephanie-Cliffords-483447721.html>

8 10. Attached hereto as **Exhibit I** is a true and correct copy of an article from
9 SF Gate dated August 22, 2018 entitled “Stormy Daniels to perform at Northern
10 California strip club” which can be found at
11 [https://www.sfgate.com/entertainment/article/Stormy-Daniels-cohen-sacramento-](https://www.sfgate.com/entertainment/article/Stormy-Daniels-cohen-sacramento-strip-club-norcal-13175658.php)
12 [strip-club-norcal-13175658.php](https://www.sfgate.com/entertainment/article/Stormy-Daniels-cohen-sacramento-strip-club-norcal-13175658.php)

11. Attached hereto as **Exhibit J** is a true and correct copy of an August 22, 2018 article from the Sacramento Bee entitled “Stormy Daniels will strip at Sacramento-area club” , which can be found at <https://www.sacbee.com/news/politics-government/capitol-alert/article217153995.html>

12. Attached hereto as **Exhibit K** is a true and correct copy of a June 15, 2018 article from the San Diego Tribune entitled “San Diego strip club says it has booked Stormy Daniels as part of national tour”, which can be found at <http://www.sandiegouniontribune.com/news/politics/sd-me-stormy-daniels-20180615-story.html>

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct.

25 Executed on November 7, 2018, at Los Angeles, California.

26 /s/ Brent H. Blakely
27 BRENT H. BLAKELY

EXHIBIT A

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**UNITED STATES DISTRICT COURT
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CASE NO.: CV 18-06893 SJO (FFMx) **DATE:** October 15, 2018

TITLE: Stephanie Clifford v. Donald J. Trump

=====

PRESENT: THE HONORABLE S. JAMES OTERO, UNITED STATES DISTRICT JUDGE

Victor Paul Cruz
Courtroom Clerk

Not Present
Court Reporter

COUNSEL PRESENT FOR PLAINTIFF:

COUNSEL PRESENT FOR DEFENDANTS:

Not Present

Not Present

=====

PROCEEDINGS (in chambers): ORDER GRANTING DEFENDANT DONALD J. TRUMP'S SPECIAL MOTION TO DISMISS/STRIKE COMPLAINT [Docket No. 28]; ORDER DENYING AS MOOT DEFENDANT DONALD J. TRUMP'S ALTERNATIVE MOTION TO DISMISS COMPLAINT [Docket No. 28]

This matter is before the Court on Defendant Donald J. Trump's Special Motion To Dismiss/Strike Plaintiff Stephanie Clifford's Complaint Pursuant To Anti-SLAPP Statute ("Special Motion") Or Alternatively Defendant's Motion To Dismiss Complaint Pursuant To FRCP 12(b)(6) ("Motion"), filed August 27, 2018. Plaintiff opposed the Special Motion and the Motion ("Opposition") on September 3, 2018. Plaintiff replied ("Reply") on September 10, 2018. The Court held argument on the Special Motion and the Motion on September 24, 2018. (See Transcript of Proceedings, ECF No. 34.) For the following reasons, the Court **GRANTS** Defendant's Special Motion To Dismiss/Strike. The Court **DENIES AS MOOT** Defendant's alternative Motion To Dismiss.

I. FACTUAL AND PROCEDURAL BACKGROUND

A. Plaintiff's Allegations In The Operative Complaint

Plaintiff Stephanie Clifford filed the operative Complaint against Defendant Donald J. Trump on April 30, 2018 in the Southern District of New York. In the Complaint, Ms. Clifford alleges as follows.

Ms. Clifford began an intimate relationship with Mr. Trump in the summer of 2006. (Compl. ¶ 5, ECF No. 1.) In May of 2011, she agreed to cooperate with *In Touch Magazine* in connection with an article about her relationship with Mr. Trump. (Compl. ¶ 6.) She agreed to speak to the magazine after her ex-husband approached the magazine without her approval. (Compl. ¶ 6.) A few weeks after agreeing to speak to the magazine, a man approached and threatened Ms. Clifford in Las Vegas, Nevada. (Compl. ¶ 7.) The man purportedly approached Ms. Clifford, threatened Ms. Clifford's daughter, and told her to "Leave Trump alone. Forget the story." (Compl. ¶¶ 8-9.)

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After Mr. Trump was elected President of the United States on November 8, 2016, Ms. Clifford worked with a sketch artist to render a sketch of the person who had purportedly threatened her in 2011. (Compl. ¶ 14.) Ms. Clifford released the sketch publicly on April 17, 2018. (Compl. ¶ 14.)

The next day, on April 18, 2018, Mr. Trump, from his personal Twitter account (@realDonaldTrump), posted a purportedly false statement regarding Ms. Clifford, the sketch, and Ms. Clifford's account of the threatening incident that took place in 2011. (Compl. ¶ 15.) Mr. Trump's tweet read as follows: "A sketch years later about a nonexistent man. A total con job, playing the Fake News Media for Fools (but they know it)!" (Compl. ¶ 15.) Mr. Trump posted this tweet in response to another tweet posted by an account named DeplorablyScottish (@ShennaFoxMusic), which showed side-by-side images of the sketch released by Ms. Clifford and a picture of Ms. Clifford and her husband. (Compl. ¶ 16.)

Based on this tweet, Ms. Clifford brings the instant lawsuit against Mr. Trump for defamation. (See Compl. ¶¶ 21-38.) She argues that Mr. Trump's tweet attacks the veracity of her account of the threatening incident that took place in 2011. (Compl. ¶ 17.) She also contends that Mr. Trump's tweet suggests that she is falsely accusing an individual of committing a crime against her. (Compl. ¶ 17.) According to Plaintiff, "Mr. Trump meant to convey that Ms. Clifford is a liar, someone who should not be trusted, that her claims about the threatening encounter are false, and that she was falsely accusing the individual depicted in the sketch of committing a crime, where no crime had been committed." (Compl. ¶ 28.) As a result, she contends that Mr. Trump's tweet was false and defamatory, and that the tweet was defamation *per se* because it charged her with committing a serious crime. (Compl. ¶¶ 17, 19.)

Ms. Clifford goes on to claim that Mr. Trump acted with actual malice in issuing the tweet because he knew the falsity of his tweet. This is because, according to Ms. Clifford, the person who threatened her in 2011 acted at the direction of Mr. Trump or Mr. Trump's attorney, Michael Cohen. (Compl. ¶ 31.) In the alternative, she contends that Mr. Trump acted with reckless disregard for the truth or falsity of his tweet because he had no way of knowing whether the 2011 incident had occurred. (Compl. ¶ 32.)

Finally, Ms. Clifford contends that she suffered damages as a result of the tweet because Mr. Trump's statement exposed her to "hatred, contempt, ridicule, and shame, and discouraged others from associating or dealing with her." (Compl. ¶ 33.) Therefore, she "has suffered damages in an amount to be proven at trial, including but not limited to, harm to her reputation, emotional harm, exposure to contempt, ridicule, and shame, and physical threats of violence to her person and life." (Compl. ¶ 34.) Mr Clifford claims that she has retained the services of professional bodyguards and other protective services because of the threats that she has received. (Compl. ¶ 36.)

B. Procedural History

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Ms. Clifford first brought this lawsuit in the United States District Court for the Southern District of New York. She initially contended that venue was appropriate in the Southern District of New York because it is the district in which Mr. Trump resides. (Compl. ¶ 4.)

On July 23, 2018, Mr. Trump filed a motion to transfer the case from the Southern District of New York to this Court pursuant to 28 U.S.C. § 1404(a). (See Motion To Transfer, ECF No. 11.) Defendant argued in part that this lawsuit relates to other litigation before this Court involving Plaintiff and Defendant concerning the enforceability of a non-disclosure agreement. (See Memorandum In Support of Motion To Transfer at 1, ECF No. 11-1.)

Plaintiff initially opposed the transfer, arguing in part that the instant action was not closely related to the other litigation before this Court. (See Response In Opposition To Motion To Transfer, ECF No. 13 at 1.) After a meet and confer process, Plaintiff and Defendant jointly agreed to transfer Plaintiff's defamation case to this Court. On August 8, 2018, the district court in the Southern District of New York granted Plaintiff and Defendant's joint stipulation to transfer. (See ECF No. 17, ECF No. 18.)

On August 27, 2018, Defendant brought the instant Special Motion To Dismiss/Strike Plaintiff's Complaint. In the Special Motion, Defendant contends that Ms. Clifford's Complaint fails to state a cause of action for defamation because (1) Mr. Trump's tweet is a protected opinion, (2) Ms. Clifford did not suffer damages as a result of the tweet, and (3) Mr. Trump did not act with malice or reckless disregard for the truth when he issued the tweet. (See Special Motion at 1.) Defendant argues that Ms. Clifford's lawsuit is a Strategic Lawsuit Against Public Participation ("SLAPP"). (See *id.*)

The Court held argument on September 24, 2018 and subsequently submitted this matter.

II. ANALYSIS

A. Choice of Law

Before addressing the substance of Defendant's Special Motion To Dismiss/Strike, this Court must decide which state's substantive law governs its analysis. Applying New York choice-of-law principles, Defendant argues that the Texas Citizens Participation Act ("TCPA" or "Texas Anti-SLAPP statute") governs this case. (See Special Motion at 7-9.) Plaintiff disagrees, arguing that New York's anti-SLAPP law governs this dispute because Mr. Trump is a citizen of the state of New York. (See Opposition at 8.)

The Court applies the Texas anti-SLAPP statute because Ms. Clifford brought this diversity action in the Southern District of New York, and a state court in New York would apply the TCPA to this case.

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1. New York Choice-of-Law Provisions Govern This Court's Analysis of Defendant's Special Motion.

"For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought." 28 U.S.C. § 1404(a). In *Van Dusen v. Barrack*, the United States Supreme Court held that where a defendant seeks to transfer an action to another district court in the country, "the transferee district court must be obligated to apply the state law that would have been applied if there had been no change of venue." 376 U.S. 612, 639 (1964). In *Ferens v. John Deere Company*, the Supreme Court extended this rule to those cases where a plaintiff initiates a transfer. 494 U.S. 516, 525 (1990).

Ms. Clifford, a citizen of the state of Texas, brings this defamation action against Mr. Trump, a citizen of the state of New York.¹ This Court has diversity jurisdiction under 28 U.S.C. Section 1332. The instant case is a diversity action transferred to this Court from the Southern District of New York with the consent of both parties. Therefore, the Court applies New York choice-of-law principles to determine which forum's substantive law governs the Court's analysis of the Special Motion To Dismiss/Strike.

2. Under New York Choice Of Law Principles, Texas Law Applies To Plaintiff's Allegations of Defamation and the Special Motion To Dismiss/Strike.

Under New York's choice-of-law principles, the law of the situs of the injury generally applies to a tort lawsuit involving diverse parties. See *Stoyanovskiy v. Amerada Hess Corp.*, 286 A.D.2d 727, 728 (2001). However, in this day and age, with the publication of statements in online fora, the tort of defamation often involves a plaintiff injured in several jurisdictions. For multistate defamation actions, where the situs of the injury may be in multiple jurisdictions, "New York applies the law of the state with the most significant interest in litigation," which generally is the state where a plaintiff is domiciled. See *Lee v. Bankers Trust Co.*, 166 F.3d 540, 545 (2d. Cir. 1999). Plaintiff alleges in the Complaint that Ms. Clifford is a "resident of the State of Texas," (Compl. ¶ 1), and conceded during argument on September 24, 2018 that Ms. Clifford is domiciled in Texas. (See Transcript of Proceedings at 11: 7.) Therefore, this Court applies Texas law to Plaintiff's allegations of defamation and Defendant's Special Motion To Dismiss/Strike.²

¹ Defendant Mr. Trump argues that he is a citizen of Washington D.C. because he resides at the White House, not in New York city. For purposes of the Court's choice-of-law analysis here, the Court is required to apply Texas law to Ms. Clifford's defamation action, whether Mr. Trump is a citizen of New York or Washington D.C.

² In analyzing Defendant's Special Motion To Dismiss/Strike under the TCPA, the Court borrows from courts' analysis of California's anti-SLAPP statute. "The California

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The Restatement (Second) Conflicts of Law supports this Court's holding that Texas law applies. In defamation lawsuits involving "multistate communication," a court must apply "the local law of the state where the plaintiff has suffered the greatest injury by reason of [her] loss of reputation," which "will usually be the state of the plaintiff's domicile if the matter complained of has there been published." Restatement (Second) of Conflict of Laws § 150 (1971).

B. Defendant's Special Motion To Strike/Dismiss Is Analogous To A Motion To Dismiss Under Federal Rule of Civil Procedure 12(b)(6).

Having concluded that the TCPA applies to the Complaint and the Special Motion, the Court next determines if it is appropriate to adjudicate the Special Motion at the present stage of litigation before any discovery has taken place. Plaintiff argues that Mr. Trump's Special Motion should be adjudicated as a motion for summary judgment. (See Opposition at 5-6; Transcript of Proceedings at 15:3-16:6, 17:5-24.) If this were the case, the parties would be permitted to pursue discovery prior to a ruling on the Special Motion. Plaintiff's argument, however, has no merit.

For purposes of the Federal Rules of Civil Procedure, a motion brought on anti-SLAPP grounds can either be analogous to a motion to dismiss or a motion for summary judgment. If a defendant moves to strike/dismiss based on purely legal arguments and the fact that a complaint does not allege sufficient facts to support its stated causes of action, this Court analyzes the motion under the standards set out in Federal Rule of Civil Procedure 8 and 12(b)(6). See *Planned Parenthood Fed'n of Am., Inc. v. Ctr. for Med. Progress*, 890 F.3d 828, 833-34 (9th Cir. 2018). If a defendant makes a factual challenge to a complaint, including by providing alternate facts to challenge the allegations in a complaint, this Court treats the motion to strike/dismiss as a motion for summary judgment. See *id.*

Here, Mr. Trump's Special Motion is analogous to a motion to dismiss because it makes three main arguments, all of which assume the truth of the allegations in the Complaint and ask this Court to dismiss Plaintiff's action because these facts do not sustain a cause of action for defamation. First, Defendant argues that although Plaintiff alleges that the President made a defamatory statement in a tweet,³ the statement, as alleged in the Complaint, is a constitutionally-

statute—section 425.16 of the California Code of Civil Procedure—was one of the earliest 'anti-SLAPP' laws and has been a primary model or influence on similar laws subsequently enacted in other states, including, directly or indirectly, the TCPA." *Serafine v. Blunt*, 466 S.W.3d 352, 386 (Tex. App. 2015).

³ For purposes of arguing the Motion To Strike/Dismiss, Defendant accepts that Mr. Trump sent the tweet stating "A sketch years later about a nonexistent man. A total con job, playing the Fake News Media for Fools (but they know it)!" Defendant assumes that Mr. Trump issued this tweet and argues that Plaintiff cannot sue Defendant for defamation

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protected opinion. (See Special Motion at 9-10.) Second, Defendant argues that Plaintiff has not sufficiently alleged damages as a result of Mr. Trump's purported defamation because the damages that she suffered could have arisen from an alternate cause. (See Special Motion at 11-14.) Third, Defendant argues that Plaintiff has not alleged sufficient facts to show that Mr. Trump acted with actual malice or reckless disregard for the truth, aside from Plaintiff's conclusory statements that Mr. Trump had knowledge of the threat that Plaintiff received in 2011. (See Special Motion at 14-16.) Each of these arguments largely assume the truth of the Complaint, but nevertheless make the point that the Complaint does not allege sufficient facts to meet each prong of the defamation standard.

In addition to these three arguments, Defendant's Special Motion sets forth some facts beyond those alleged in the Complaint.⁴ For example, Defendant argues that Ms. Clifford did not sufficiently allege that she suffered damages because, in fact, she benefitted economically from Mr. Trump's defamatory statement. To prove this, Defendant points to evidence outside the Complaint of Ms. Clifford's economic well-being. (See Special Motion at 13-14.) In making its ruling, the Court takes no position as to any argument concerning the purported benefit that Ms. Clifford received as a result of the tweet in question. The remainder of Defendant's arguments are properly brought at the present stage of litigation.

C. Defendant's Special Motion To Dismiss/Strike Is Timely.

The next threshold inquiry is whether the Special Motion is timely. Plaintiff contends that it is not, because Mr. Trump should have brought the Special Motion within 60 days of May 23, 2018, as required by the TCPA. This is the date on which Mr. Trump waived service of Ms. Clifford's defamation action. (See Opposition at 7.)

The Court holds that although Mr. Trump may not have complied with the filing deadline, there is good cause to permit the Special Motion to proceed given the procedural history of this case, which includes a transfer to this Court from a district court in the Southern District of New York.

based on the content of the tweet.

⁴ Plaintiff and Defendant have filed evidentiary objections to several of the factual submissions. In doing so, both parties correctly point out that this Court should not take into account facts outside the Complaint in deciding this Special Motion. Aside from otherwise judicially-noticeable facts, the Court does not take into account facts outside the Complaint in reaching its final holding that Mr. Trump's tweet is a non-actionable opinion that cannot be the subject of a defamation claim.

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Plaintiff's argument concerning the applicability of the 60-day deadline in federal court raises an unresolved issue of law. Like the TCPA, California's anti-SLAPP statute contains a 60-day requirement. No court in this Circuit, or the Fifth Circuit, has ruled on whether an anti-SLAPP motion, brought as a motion to dismiss as opposed to a motion for summary judgment, is subject to the 60-day deadline. To be sure, federal courts have held that the 60-day deadline in California's anti-SLAPP statute does not apply to anti-SLAPP motions that are analogous to motions for summary judgment. See *Metabolife Int'l, Inc. v. Wornick*, 264 F.3d 832, 846 (9th Cir. 2001) (citing *Rogers*, 57 F. Supp. 2d at 982). The 60-day deadline is a procedural rule under the *Erie* doctrine that conflicts with Federal Rule of Civil Procedure 56. See *Sarver v. Chartier*, 813 F.3d 891, 900 (9th Cir. 2016). This is because the 60-day deadline seeks to limit discovery and allow for anti-SLAPP motions at an early stage of litigation, while Rule 56 seeks to promote discovery, requiring motions for summary judgment after litigation has proceeded for some time. See *id.* As analyzed above, however, Mr. Trump's anti-SLAPP motion is analogous to a motion to dismiss, not a motion for summary judgment. The discovery rationale that underpins a case like *Metabolife International* does not exist here.

Nevertheless, the Court does not need to address the applicability of the 60-day deadline to the Special Motion because there is "good cause" to permit it to proceed. See *Schimmel v. McGregor*, 438 S.W.3d 847, 856 (Tex. App. 2014) (holding that the TCPA allows a court to waive the motion filing deadline where "good cause" exists). Ms. Clifford initially filed her defamation action in the Southern District of New York, and there was some dispute as to whether that district was the appropriate venue for this case. After briefing on the matter, Ms. Clifford's defamation action was transferred to this Court on August 8, 2018. After the transfer, Defendant did not delay bringing this Special Motion, filing it on August 27, 2018, nineteen days after the transfer and well-within the 21-day deadline in which a defendant must normally file a responsive pleading after a plaintiff files a complaint. See Fed. Rule Civ. P. Rule 12(a). Importantly, the instant case did not proceed in any material respect after Plaintiff's initial filing of the Complaint in April 2018. This limits the prejudice that Plaintiff may face from an untimely anti-SLAPP motion. See *New.Net, Inc. v. Lavasoft*, 356 F. Supp. 2d 1090, 1100 (C.D. Cal. 2004). Defendant's filing of this Special Motion after the 60-day deadline also does not frustrate the TCPA's purpose of dismissing improper lawsuits at an early stage of litigation. See *id.* (holding that one purpose of California's 60-day deadline for anti-SLAPP motions was to dismiss lawsuits early in litigation). Accordingly, "good cause" exists to allow Defendant to proceed with this Special Motion, even if the filing did not comply with the TCPA's 60-day deadline.

D. Standard Under The TCPA

Having determined (1) that the TCPA applies to the Special Motion and Ms. Clifford's defamation action, (2) that this Court treats the Special Motion as analogous to a motion to dismiss under

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Federal Rule of Civil Procedure 12(b)(6), and (3) that there is "good cause" to permit the Special Motion after the expiration of 60 days from the initial filing of the Complaint, the Court next applies the substantive requirements of the TCPA to the Special Motion and the allegations in the Complaint.

Texas offers robust protection for the freedom of speech. The TCPA, like analogous anti-SLAPP statutes in other jurisdictions including California, seeks to "encourage and safeguard the constitutional rights of persons to petition, speak freely, associate freely, and otherwise participate in government to the maximum extent permitted by law and, at the same time, protect the rights of a person to file meritorious lawsuits for demonstrable injury." Tex. Civ. Prac. & Rem. Code § 27.002.

Analysis of an anti-SLAPP motion under the TCPA proceeds in three steps. First, a defendant must show, by a preponderance of the evidence, that a plaintiff's complaint is based on, relates to, or is in response to the defendant's exercise of: (1) the right of free speech; (2) the right to petition; or (3) the right of association. See Tex. Civ. Prac. & Rem. Code § 27.005(b); *In re Lipsky*, 460 S.W.3d 579, 586 (Texas 2015). The TCPA defines "exercise of the right of free speech" as "a communication made in connection with a matter of public concern." Tex. Civ. Prac. & Rem. Code § 27.001(3). A communication includes "the making or submitting of a statement or document in any form or medium, including oral, visual, written, audiovisual, or electronic." *Id.* § 27.001(1). A "matter of public concern" includes an issue related to: "(A) health or safety; (B) environmental, economic, or community well-being; (C) the government; (D) a public official or public figure; or (E) a good, product, or service in the marketplace." *Id.* § 27.001(7). Second, the burden then shifts to the plaintiff to "establish[] by clear and specific evidence a prima facie case for each essential element of the claim in question." *Id.* § 27.005(c). Third, the defendant can still prevail under the TCPA if he/she "establishes by a preponderance of the evidence each essential element of a valid defense" to the plaintiff's claim. *Id.* § 27.005(d). See also *ExxonMobil Pipeline Company v. Coleman*, 512 S.W.3d 895, 898-99 (summarizing the standard under the TCPA).

Here, Defendant's Special Motion does not allege any defenses to plaintiff's defamation claim. The Court addresses the other two steps of the TCPA analysis in turn.

1. Plaintiff's Defamation Lawsuit Relates To Defendant's Right of Free Speech.

There is little dispute that Ms. Clifford's Complaint relates to Mr. Trump's exercise of his right of free speech on an issue of public concern. In reaching this conclusion, the Court is mindful of the fact that Texas "look[s] to the entire communication as well as the context of the communication in which the allegedly defamatory statement is made." *Cruz v. Van Sickle*, 452 S.W.3d 503, 514 (Tex. App. 2014). Here, the statement at issue is Mr. Trump's reaction to Plaintiff's release of the

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sketch of a person who threatened Plaintiff in connection with a purported affair that she had with Mr. Trump. Although Mr. Trump was not the President at the time of the purported affair or the purported threat that Plaintiff received, Mr. Trump is now the President and was the President at the time of the tweet. Moreover, Mr. Trump issued the tweet in the context of Plaintiff publicly styling herself as an adversary to the President, including in filings before this Court. (See, e.g., First Amended Complaint in *Stephanie Clifford v. Donald Trump et al.* at ¶ 17, No. 2:18-cv-02217-SJO-FFM (arguing that "Mr. Trump, with the assistance of his attorney Mr. Cohen, aggressively sought to silence Ms. Clifford as part of an effort to avoid her telling the truth, thus helping to ensure he won the Presidential Election").) The tweet in question, therefore, relates to an issue involving a public official on a matter of public concern. See *id.* (holding that the TCPA applies to a defamation claim involving "a public official or public figure," including a candidate for judicial office). Accordingly, the TCPA applies to the Special Motion To Dismiss/Strike.

2. Plaintiff Fails To Establish a Prima Facie Case For Defamation.

The Court next analyzes whether Plaintiff has established a prima facie case for defamation. To prevail on a cause of action for defamation under Texas law, Plaintiff must allege that: (1) Mr. Trump published a false statement; (2) that defamed Ms. Clifford; (3) with the requisite degree of fault regarding the truth of the statement (negligence if Ms. Clifford is a private individual or malice if Ms. Clifford is a public individual); and (4) damages (unless the statement constitutes defamation per se). See *D Magazine Partners, L.P. v. Rosenthal*, 529 S.W.3d 429, 434 (Tex. 2017).

a. False Statement

In the Special Motion, Mr. Trump argues that the tweet at issue is a non-actionable opinion, not a statement of fact about Ms. Clifford. (Special Motion at 9.) "Expressions of opinion may be derogatory and disparaging; nevertheless they are protected by the First Amendment of the United States Constitution and by article I, section 8 of the Texas Constitution." *Shaw v. Palmer*, 197 S.W.3d 854, 857 (Tex. App. 2006).

The Court agrees with Mr. Trump's argument because the tweet in question constitutes "rhetorical hyperbole" normally associated with politics and public discourse in the United States. The First Amendment protects this type of rhetorical statement.

"It is well settled that 'the meaning of a publication, and thus whether it is false and defamatory, depends on a reasonable person's perception of the entirety of a publication and not merely on individual statements.'" See *Bentley v. Bunton*, 94 S.W.3d 561, 579 (Tex. 2002) (quoting *Turner v. KTROK Television, Inc.*, 38 S.W. 3d 103, 115 (Tex. 2000)). To assess whether a statement is "rhetorical hyperbole," this Court looks to the statement "as a whole in light of the surrounding circumstances and based upon how a person of ordinary intelligence would perceive it."

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Campbell v. Clark, 471 S.W.3d 615, 625 (Tex. App. 2015). Because Mr. Trump's tweet involves a matter of public concern, including purported acts committed by the now President of the United States, the Court applies the following three principles to determine if the tweet is actionable for defamation (the "*Bentley/Milkovich*" analysis). See *Bentley*, 94 S.W.3d at 580. See also *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 19 (1990) (setting out the standard summarized below).

1. A statement on matters of public concern must be provable as false before there can be liability for defamation.
2. The United States Constitution protects statements that cannot reasonably be interpreted as stating actual facts about an individual made in debate over public matters in order to provide assurance that public debate will not suffer for lack of imaginative expression or the rhetorical hyperbole which has traditionally added much to the discourse of the United States.
3. Where a statement of "opinion" on a matter of public concern reasonably implies false and defamatory facts regarding public figures or officials, those individuals must show that such statements were made with knowledge of their false implications or with reckless disregard of their truth, and where such a statement involves a private figure on a matter of public concern, a plaintiff must show that the false connotations were made with some level of fault.

Mr. Trump's tweet stated as follows: "A sketch years later about a nonexistent man. A total con job, playing the Fake News Media for Fools (but they know it)!" When the first step in the *Bentley/Milkovich* analysis is applied to this tweet, Plaintiff correctly points out that Mr. Trump's tweet contains two verifiably true/false statements: (1) that the man who threatened Ms. Clifford in 2011 does not exist and therefore, that Plaintiff is lying about her encounter with him; and (2) that Ms. Clifford is engaging in a "con job" or is lying to Mr. Trump, the public, and the media about the threat (and by implication her affair with Mr. Trump). If the man who threatened Ms. Clifford in 2011 does exist, or if Ms. Clifford is not lying to Mr. Trump, the public, and the media about the threats that she received or her affair with Mr. Trump, Mr. Trump's tweet would be verifiable as false.

Plaintiff's argument crumbles when it comes to the second step in the *Bentley/Milkovich* analysis. Mr. Trump's tweet constitutes "rhetorical hyperbole," which is "extravagant exaggeration [that is] employed for rhetorical effect." *Backes v. Misko*, 486 S.W.3d 7, 26 (Tex. App. 2015) (quoting *Am. Broad. Cos. v. Gill*, 6 S.W.3d 19, 30 (Tex. App. 1999)). Specifically, Mr. Trump's tweet displays an incredulous tone, suggesting that the content of his tweet was not meant to be understood as

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a literal statement about Plaintiff. Instead, Mr. Trump sought to use language to challenge Plaintiff's account of her affair and the threat that she purportedly received in 2011. As the United States Supreme Court has held, a published statement that is "pointed, exaggerated, and heavily laden with emotional rhetoric and moral outrage" cannot constitute a defamatory statement. See *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 32 (1990).

Mr. Trump also issued the tweet in the context of Plaintiff presenting herself as a political adversary to the President. *Rehak Creative Services, Inc. v. Witt* is instructive in this regard. See 404 S.W.3d 716 (Tex. App. 2013), *disapproved on other grounds by In re Lipsky*, 460 S.W.3d 579 (Tex. 2015). In *Rehak*, an advertising agency that worked with Jim Murphy, a state representative serving in the Texas House of Representatives, sued Ann Witt, a candidate who ran against Murphy in the Republican primary. *Id.* at 722. The advertising agency sued Witt for defamation on the grounds that Witt's website contained a series of defamatory statements against Murphy, including Witt's accusations that Murphy "sidestepped" the Texas Constitution by serving as a legislator while receiving payment as a consultant. *Id.* at 720. Witt's website also compared Murphy to a character in the book and musical, *How to Succeed in Business Without Really Trying*, accused Murphy of "ripping off taxpayers," and stated that among Jim Murphy's "sleazy steps" to success included "STEP 6: Reward your supporters with government contracts." *Id.* at 721. The Texas Court of Appeals held that none of the statements on Witt's website constituted defamation in large part because Witt's "website's tone" and the "campaign context" of the statements suggested that the statements constituted "rhetorical hyperbole" that was part of politics. *Id.* at 730. The website "demonstrate[d] an attempt to deliver a political message about the use of public money in an exaggerated, provocative and amusing way," expression that lies at "the heart of the First Amendment." *Id.* at 730. See also *Campbell v. Clark*, 471 S.W.3d 615, 625 (Tex. App. 2015) (collecting cases on "rhetorical hyperbole" in the political context).

The instant case is similar to *Rehak* in that Mr. Trump, as President, made a hyperbolic statement against a person who has sought to publicly present herself as a political adversary to him. In filings before this Court, Ms. Clifford has challenged the legitimacy of Mr. Trump's victory in the 2016 Presidential election. Mr. Trump's tweet served as a public rejoinder to allegations made by Plaintiff. If this Court were to prevent Mr. Trump from engaging in this type of "rhetorical hyperbole" against a political adversary, it would significantly hamper the office of the President. Any strongly-worded response by a president to another politician or public figure could constitute an action for defamation. This would deprive this country of the "discourse" common to the political process. In short, should Plaintiff publicly voice her opinions about Mr. Trump, Mr. Trump is entitled to publicly voice non-actionable opinions about Plaintiff. To allow Plaintiff to proceed with her defamation action would, in effect, permit Plaintiff to make public allegations against the President without giving him the opportunity to respond. Such a holding would violate the First Amendment.

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Mr. Trump also made a one-off rhetorical comment, not a sustained attack on the veracity of Plaintiff's claims. This distinguishes the instant case from other cases where courts have determined that public statements constituted defamation. In *Bentley*, for example, the host of a call-in talk show on a public-access channel repeatedly accused a judge of being corrupt. See *Bentley*, 94 S.W.3d at 584. When confronted about the veracity of the allegations, the talk show host doubled down, falsely claiming that he had proof of the judge's corruption, including public records and records of conversations with courthouse employees. See *id.* The Texas Supreme Court held that while a "single, excited reference to [the judge's corruption] might be taken to be rhetorical hyperbole . . . [the host's] characterization of [the judge's] conduct as criminal is only part of [the host's] efforts over many months to prove [the judge] corrupt." *Id.* at 581. Here, Mr. Trump's tweet falls far more in line with a "single, excited reference." Unlike the defendant in *Bentley*, Mr. Trump provided no support for his views in the tweet nor did he repeat the allegations in the tweet.

Accordingly, the Court grants the Special Motion because Mr. Trump's statement constituted "rhetorical hyperbole" that is protected by the First Amendment.

b. Actual Malice or Reckless Disregard For The Truth

Having determined that Mr. Trump's tweet is non-actionable, the Court's analysis of the Special Motion ends. In the interest of completeness, the Court briefly addresses a few of the other arguments made by the parties in the briefing.

The parties spend some time debating whether Mr. Trump acted with "actual malice" or "reckless disregard for the truth" in issuing the tweet in question. Assuming that Plaintiff is a "public figure," Plaintiff would have to show that Defendant acted with "actual malice" or "reckless disregard for the truth" to prevail on a cause of action for defamation. See *Bentley*, 94 S.W.3d at 580.

Plaintiff's focus on the actual malice argument comes as no surprise because Plaintiff stands on thin ice in asserting that Mr. Trump's tweet is an actionable statement. Instead, Plaintiff seeks to use her defamation action to engage in a "fishing expedition" concerning the conclusory allegations in the Complaint. The Court will not permit Plaintiff to exploit the legal process in this way.

Specifically, Plaintiff contends that she needs to conduct discovery to determine if Mr. Trump was involved in the 2011 threat against her or if he purposefully avoided learning about the 2011 threat. See Opposition at 11. Plaintiff believes that discovery pertaining to these issues will help her to establish that Mr. Trump acted with actual malice or reckless disregard for the truth (i.e. if Ms. Clifford can provide evidence showing that Mr. Trump knew of the 2011 threat, then he tweeted a lie when he challenged Plaintiff's reporting of the 2011 threat). (See Transcript of Proceedings

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at 29:23-30:4.) However, Plaintiff's reasoning is entirely circular. She assumes that Mr. Trump knew of the 2011 threat, argues in her Complaint and her briefing that Mr. Trump knew of the 2011 threat, and then asks this Court for discovery to prove that Mr. Trump knew of the 2011 threat. In doing so, Plaintiff does not allege facts establishing how Mr. Trump knew or did not know about the 2011 threat in the first place. Plaintiff must do this to sustain a cause of action for defamation.

c. Damages

Defendant's Special Motion also alleges that Plaintiff has not adequately pleaded damages. (Special Motion at 11-14.) The Court declines to address this. As with the issue of actual malice, the Court does not need to reach the damages question because it grants the Special Motion on other grounds.

D. Leave To Amend

Having granted the Special Motion, the Court next determines if it should grant Plaintiff leave to amend the Complaint. While recognizing that courts in this Circuit sometimes do grant plaintiffs the opportunity to amend a complaint before granting an anti-SLAPP motion to strike, the Court holds that Ms. Clifford should not have this opportunity because any amendment would be futile. See *Verizon Delaware, Inc. v. Covad Communications Co.*, 377 F.3d 1081, 1091 (2004) ("[G]ranteeing a defendant's anti-SLAPP motion to strike a plaintiff's initial complaint without granting the plaintiff leave to amend would directly collide with Fed. R. Civ. P. 15(a)'s policy favoring liberal amendment."); *Gardner v. Martino*, 563 F.3d 981, 992 (9th Cir. 2009) (denying leave to amend on futility grounds).

The Court holds that Mr. Trump's tweet is "rhetorical hyperbole" and is protected by the First Amendment. Plaintiff cannot amend the Complaint in a way that challenges this holding. During argument on this matter, Plaintiff suggested that she could amend her Complaint to "shore up the malice allegations" and to "provide context for the statement to show that, in fact, it was not political nature at the time it was made." (Transcript of Proceedings at 44: 8-13.) The former amendments are futile because this Court rules that Mr. Trump's tweet is protected by the First Amendment. The issue of malice is irrelevant to this holding. The latter amendments are futile because there is no way for Plaintiff to amend the Complaint to transform the tweet from "rhetorical hyperbole" into an actionable statement. See *Gardner*, 563 F.3d at 992. "A party cannot amend pleadings to 'directly contradic[t] an earlier assertion made in the same proceeding.'" *Airs Aromatics, LLC v. Opinion Victoria's Secret Stores Brand Mgmt., Inc.*, 744 F.3d 595, 600 (9th Cir. 2014) (quoting *Russell v. Rolfs*, 893 F.2d 1033, 1037 (9th Cir.1990)). Plaintiff cannot change Mr. Trump's tweet or the basic context of the tweet. Nor can Plaintiff withdraw factual allegations that she has made in pleadings before this Court. In the other litigation before

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this Court, Ms. Clifford argues that Mr. Trump sought to silence her as a strategy to win the Presidential election, a clear argument against the legitimacy of Mr. Trump's Presidency. (See First Amended Complaint in *Stephanie Clifford v. Donald Trump et al.* at ¶ 17, No. 2:18-cv-02217-SJO-FFM.) Mr. Trump issued the tweet as a rejoinder against an individual challenging him in the public arena. This is the definition of protected rhetorical hyperbole. The Court denies Plaintiff leave to amend the Complaint.

E. Attorney's Fees

Having granted the Special Motion and denied Plaintiff leave to amend, the Court finally holds that Defendant is entitled to attorney's fees. Texas law is unambiguous that "the TCPA requires an award of 'reasonable attorney's fees' to the successful movant." *Sullivan v. Abraham*, 488 S.W.3d 294, 299 (Tex. 2016). "A 'reasonable' attorney's fee 'is one that is not excessive or extreme, but rather moderate or fair.'" *Id.* (quoting *Garcia v. Gomez*, 319 S.W.3d 638, 642 (Tex.2010)).

III. RULING

For the foregoing reasons, the Court **GRANTS** Defendant's Special Motion To Strike/Dismiss. Defendant is entitled to attorney's fees under the Texas Citizen Participation Act. Should Defendants move for attorneys' fees, the motion must be filed within **fourteen (14)** days from the date of this order. The Court **DENIES AS MOOT** Defendant's Motion To Dismiss.

IT IS SO ORDERED.

EXHIBIT B

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County of Los Angeles

JUN 08 2018

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By: Tom G. Holmes, Deputy

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – SANTA MONICA COURTHOUSE

STEPHANIE CLIFFORD (AKA STORMY
DANIELS), an individual,

Plaintiff,

vs.

KEITH M. DAVIDSON, an individual,
MICHAEL COHEN, an individual, and DOES 1
through 10, inclusive

Defendants.

Case No. **SC129384**

COMPLAINT FOR:

- (1) BREACH OF FIDUCIARY DUTY;
- (2) AIDING AND ABETTING BREACH
OF FIDUCIARY DUTY

CASE MANAGEMENT CONFERENCE

12-3-18 8:30am
Judge C. Karlan Date Sept N

1 Plaintiff Stephanie Clifford (aka Stormy Daniels) ("Ms. Clifford" or "Plaintiff") hereby alleges
2 the following:

3
4 **THE PARTIES**

- 5 1. Plaintiff Ms. Clifford, an individual, is a resident of the State of Texas.
- 6 2. Defendant Keith M. Davidson ("Mr. Davidson"), an individual, is a citizen of the State
7 of California.
- 8 3. Defendant Michael Cohen ("Mr. Cohen"), an individual, is a citizen of the State of
9 New York.
- 10 4. Mr. Davidson and Mr. Cohen together shall be referred to hereafter as "Defendants."
- 11 5. The true names and capacities of the defendants DOES 1 through 10, inclusive,
12 whether individual, plural, corporate, partnership, associate or otherwise, are not known to Plaintiff,
13 who therefore sues said defendants by such fictitious names. Plaintiff will seek leave of court to
14 amend this Complaint to show the true names and capacities of defendants DOES 1 through 10,
15 inclusive, when the same have been ascertained.
- 16 6. Plaintiff is also informed and believes and thereon alleges that DOES 1 to 10 were the
17 agents, principals, and/or alter egos of Defendants, at all times herein relevant, and that they are
18 therefore liable for the acts and omissions of Defendants.

19
20 **JURISDICTION AND VENUE**

- 21 7. Venue is appropriate in the County of Los Angeles, and this Court has personal
22 jurisdiction over the Defendants and each of them by reason of the facts that: (a) Mr. Davidson resides
23 in the West Judicial District; (b) Defendants have transacted and conducted substantial business in the
24 State of California, the County of Los Angeles, and the West Judicial District; (c) many of Mr.
25 Cohen's actions alleged herein were directed to and/or occurred in the State of California and the
26 County of Los Angeles; and (d) many of the events giving rise to the claims at issue in this lawsuit
27 arose in California, including within the County of Los Angeles and the West Judicial District.
- 28

FACTUAL BACKGROUND

1
2 8. Mr. Davidson is an attorney licensed in the State of California and was retained by Ms.
3 Clifford as her personal attorney. Except as noted herein, Mr. Davidson was ostensibly acting in his
4 capacity as Ms. Clifford's attorney throughout the time period at issue in this complaint.

5 9. Mr. Cohen is an attorney licensed in the State of New York. Mr. Cohen worked as the
6 "top attorney" at the Trump Organization from 2007 until at least 2016 and served as Mr. Donald J.
7 Trump's personal attorney at all material times relating to the time period at issue.

8 10. In his capacity as Ms. Clifford's attorney, Mr. Davidson owed Ms. Clifford all of the
9 attendant duties and obligations that arise in connection with an attorney-client relationship, including
10 the duty of loyalty and the duty to maintain client confidences.

11 11. In his capacity as Ms. Clifford's attorney, Mr. Davidson communicated with Mr.
12 Cohen in connection with an October 2016 agreement for which Mr. Cohen acted as an attorney for
13 Mr. Donald Trump.

14 12. By virtue of this agreement and his experience with Mr. Davidson, Mr. Cohen was well
15 aware at all times that Mr. Davidson was Ms. Clifford's attorney and that Mr. Davidson owed Ms.
16 Clifford a continuing duty of loyalty and was in a fiduciary relationship with Ms. Clifford.

17 13. Unbeknownst to Ms. Clifford, after the agreement was signed by Ms. Clifford, Mr.
18 Davidson continued to regularly communicate with Mr. Cohen to the detriment of Ms. Clifford.

19 14. Mr. Davidson's communications with Mr. Cohen were inconsistent with his obligations
20 to Ms. Clifford, including his obligation to maintain client confidences and his duty of loyalty to Ms.
21 Clifford.

22 15. Starting in January 2018 at the latest, Defendants Davidson and Cohen acted in concert
23 to benefit not Ms. Clifford, but a client of Mr. Cohen's, namely Mr. Trump.

24 16. Specifically, on the morning of January 17, 2018, Mr. Cohen became aware of an
25 article published by *In Touch* magazine regarding Ms. Clifford and President Donald J. Trump.

26 17. Believing this story to be detrimental to his own interests or those of his client, Mr.
27 Cohen immediately colluded with Mr. Davidson in an attempt to use and manipulate Ms. Clifford in a
28 manner designed to benefit Mr. Cohen and Mr. Trump.

1 18. After learning of the magazine article, Mr. Cohen sent an iMessage to Mr. Davidson at
2 or about 12:13 PM EST stating "Call me."

3 19. On information and belief, Mr. Davidson and Mr. Cohen subsequently conversed on
4 the telephone at which time Mr. Cohen hatched a plan to have Ms. Clifford appear on Mr. Sean
5 Hannity's program to falsely deny the accuracy of the *In Touch* article.¹

6 20. Approximately two hours later, at 2:32 PM, Mr. Cohen again texted Mr. Davidson,
7 stating "I have her tentatively scheduled for Hannity tonight. Call me after your trial." On information
8 and belief, Mr. Cohen scheduled Ms. Clifford to appear on Mr. Hannity's program only after
9 consultation with Mr. Trump.

10 21. Mr. Davidson responded,

11 She cannot don't [sic] today. She is flying to LA tomorrow. I'm trying to get her to
12 commit for tomorrow. (3:21 PM)

13 22. Unsatisfied with this response and in a panic, Mr. Cohen sent several more messages in
14 a desperate attempt to convince Ms. Clifford, with the assistance of Mr. Hannity, to lie to the
15 American public about her relationship with Mr. Trump via the *Fox News* broadcast:

16 a) At 3:23 PM, Mr. Cohen messaged "It's really important. Why?"

17 b) At 3:25 PM, Mr. Cohen messaged "Can you call me please."

18 c) At 3:45 PM, Mr. Cohen again messaged, "Please call me."

19 d) At 4:18 PM, Mr. Cohen messaged Mr. Davidson, "Anything?"

20 23. At 4:30 PM, Mr. Davidson responded to Mr. Cohen stating that he was "Still trying."

21 24. At 4:30, less than one minute later, Mr. Cohen responded to Mr. Davidson stating:

22 This is no good. We need her as by doing tomorrow you just create another news cycle
23 instead of putting an end to this one.

24 25. At 4:52 PM, Mr. Cohen messaged Mr. Davidson asking "Please call me."

25 26. At 5:01 PM Mr. Cohen again messaged Mr. Davidson stating "Cmon!"

26 ¹ Mr. Cohen has previously stated that Ms. Clifford is a liar and that he did not believe her in 2016 or
27 2011 regarding her account of having a relationship with Mr. Trump. The fact that he attempted to
28 place her on Mr. Hannity's show in January 2018 for a live interview completely undercuts his
ridiculous assertions and further shows that his prior claims relating to her alleged lack of
trustworthiness were entirely baseless.

1 27. At 5:31 PM, Mr. Cohen apparently changed his mind and messaged Mr. Davidson that
2 it would be better to wait until the next day, stating:

3 Let's forget tonight. They [Fox News and the Trump Administration] would rather
4 tomorrow so they can promote the heck out of the show.

5 28. At 7:51 PM, Mr. Cohen messaged Mr. Davidson again, having apparently concluded
6 that it was no longer in his own or his client's best interest for Ms. Clifford to appear:

7 **Keith, The wise men all believe the story is dying and don't think it's smart for her**
8 **to do any interviews.** Let her do her thing but no interviews at all with anyone.
9 (emphasis added)

10 29. The "wise men" referred to above included Mr. Trump.²

11 30. At 7:52 PM, Mr. Davidson agreed without hesitation and responded, "100%."

12 31. At 7:52 PM, Mr. Cohen messaged "Thanks pal."

13 32. At 7:53 PM, Mr. Cohen added "Just no interviews or statements unless through you."

14 33. At 7:54 PM, Mr. Davidson responded "Got it."

15 34. The clear purpose of this exchange between Defendants was to collude and arrange a
16 media appearance of Ms. Clifford, not for the benefit of Ms. Clifford or to ensure that Ms. Clifford
17 truthfully told her side of the story to the media, but for Ms. Clifford to provide a false interview and
18 lie to the American people to serve the best interests of Mr. Trump and Mr. Cohen.

19 35. Indeed, once Mr. Cohen concluded that it was no longer in his own best interest, or
20 those of his client, per the recommendation of these "wise men," including Mr. Trump, Mr. Cohen
21 called off the appearance entirely and Mr. Davidson agreed without hesitation. In other words, Mr.
22 Davidson abdicated his role as an advocate and fiduciary of his client Ms. Clifford, and instead elected
23 to be a "puppet" for Mr. Cohen and Mr. Trump in order to advance their interests at the expense of
24 Ms. Clifford.

25 36. In late February 2018, Mr. Davidson became aware that Ms. Clifford was changing
26 counsel and was preparing to publicly disclose her relationship with Mr. Trump.

27 ² Mr. Trump has previously claimed that he knew nothing of the 2016 agreement or any issues relating
28 to Ms. Clifford until much later in 2018. This exchange and sequence of events demonstrates that
claim is false.

1 37. Despite his ongoing duty of loyalty to Ms. Clifford, including the obligation to
2 maintain client confidences, Mr. Davidson secretly tipped Mr. Cohen off to Ms. Clifford's plans. Mr.
3 Davidson did so for the express benefit of Mr. Cohen and Mr. Trump.

4 38. Armed with this information, and in an attempt to intimidate Ms. Clifford into silence,
5 on or about February 27, 2018, Mr. Cohen initiated an arbitration proceeding against Ms. Clifford in
6 order to obtain a temporary restraining order to silence Ms. Clifford and prevent her from publicly
7 telling her story.

8 39. Thereafter, in early March of 2018, Mr. Davidson again secretly tipped off Mr. Cohen
9 regarding Ms. Clifford's plans, this time after learning that Ms. Clifford was on the verge of filing a
10 lawsuit against Mr. Cohen and Mr. Trump.

11 40. Specifically, on or about March 1, 2018, at 10:18 AM EST, Mr. Davidson sent a
12 message to Mr. Cohen stating "Call me." On information and belief, it was during this call that Mr.
13 Davidson first disclosed to Mr. Cohen that Ms. Clifford was planning to file a lawsuit against him and
14 Mr. Trump the following week and that the lawsuit would publicly disclose the existence of Ms.
15 Clifford's prior relationship with Mr. Trump.

16 41. After learning of Ms. Clifford's plans through the improper disclosure of confidential
17 information by Mr. Davidson, Mr. Cohen undertook efforts to meet the next day with Mrs. Melania
18 Trump, in order to "get out in front" of the approaching lawsuit and publicity, and convince her that
19 Ms. Clifford was a liar and not to be trusted.

20 42. On March 2, 2018 at 3:12 PM, Mr. Davidson messaged Mr. Cohen asking "Busy?"

21 43. At 3:21 PM, Mr. Cohen sent a message stating "15 minutes we should speak."

22 44. At 3:34 PM, Mr. Davidson messaged "Call when u can."

23 45. At 3:56 PM, Mr. Cohen messaged "Exactly 4 and I will have Larry Rosen on the line
24 as well." Larry Rosen refers to Lawrence S. Rosen, an attorney who works with Mr. Cohen.

25 46. At 3:57 PM, Mr. Davidson responded "Great."

26 47. At 4:14 PM, Mr. Davidson again messaged Mr. Cohen asking, "U calling?"
27
28

1 48. At 4:15 PM, Mr. Cohen responded, "With flotus. Give me a minute."³

2 49. Upon information and belief, when Mr. Cohen met with Mrs. Trump on March 2, 2018
3 at Mar-a-Lago, Mr. Cohen did not disclose to Mrs. Trump that not only was Ms. Clifford far from
4 being a liar, Mr. Cohen had begged her to appear on Mr. Hannity's show weeks earlier. Nor did he
5 disclose that the "wise men", including Mr. Trump, had decided at the time to let the story "die."

6 50. The disclosure of any information to Mr. Cohen regarding Ms. Clifford's contemplated
7 action was a clear violation of Mr. Davidson's duty of loyalty and obligation to maintain Ms.
8 Clifford's client confidences. These duties continued regardless of whether Mr. Davidson was in fact
9 still Ms. Clifford's attorney. Again, Mr. Davidson's actions demonstrate he was more interested in
10 being Mr. Cohen and Mr. Trump's "puppet" and advancing their interests instead of advancing the
11 interests of his client consistent with his obligations under the law.

12 51. Mr. Cohen, as an attorney with knowledge of Mr. Davidson's role as Ms. Clifford's
13 counsel, knew at all times Mr. Davidson could not engage in the conduct at issue and yet colluded
14 with him.

15 52. To compound the numerous violations of attorney ethics, Mr. Cohen recorded phone
16 calls that he had with Mr. Davidson wherein Mr. Davidson disclosed client confidences and other
17 confidential information relating to Ms. Clifford.

18 53. In furtherance of his wrongful conduct in relation to Mr. Davidson, despite request, Mr.
19 Cohen has refused to provide Ms. Clifford with those recorded conversations that include her
20 attorney-client privileged information.

21 54. Since the termination of her attorney-client relationship with Mr. Davidson, Ms.
22 Clifford has sought to recover from Mr. Davidson the entirety of her client file, which is, by law, her
23 personal property. Indeed, on no fewer than five separate occasions over the last three months, Ms.
24 Clifford has demanded the entirety of her client file, together with all text messages and similar
25 correspondence relating to her, especially those that involve Mr. Cohen.

26
27 ³ The text messages set forth in this complaint are attached hereto as Exhibit A. Mr. Davidson has
28 refused to provide copies of any text messages between him and Mr. Cohen for the time period after
March 2. On information and belief, this is because said text messages further evidence his numerous
breaches of fiduciary duty to Ms. Clifford as well as Mr. Cohen's complicit conduct.

1 55. Pursuant to Rule 3-700 of the Rules of the State Bar of California, Ms. Clifford's client
2 file includes any and all correspondence Mr. Davidson engaged in regarding his representation of Ms.
3 Clifford. This includes but is not limited to text messages and other similar correspondence.

4 56. In spite of Mr. Davidson's clear obligation to return Ms. Clifford's property, Mr.
5 Davidson has not returned to Ms. Clifford the entirety of her client file.

6 57. Mr. Davidson has also not provided Ms. Clifford with all text messages and other
7 correspondence regarding Ms. Clifford, including those that involve Mr. Cohen.

8 58. Mr. Davidson's failure to provide the information demanded has prejudiced Ms.
9 Clifford in numerous ways including, but not limited to, by purposely hampering her ability to review
10 documents and cooperate with government inquiries regarding Mr. Cohen, Mr. Trump, and Mr.
11 Davidson. Indeed, Ms. Clifford has needed Mr. Davidson to disclose to her the *entirety of the*
12 *information requested* for months and yet he has purposely delayed and obstructed her efforts. On
13 information and belief, he has done so in order to protect himself, Mr. Cohen and Mr. Trump, all at the
14 detriment of Ms. Clifford.

15 59. Mr. Davidson's refusal to provide the information requested is even more outrageous
16 considering his recent conduct vis-à-vis the *Wall Street Journal*. On information and belief, at the
17 same time he was obstructing Ms. Clifford's efforts to obtain the information, Mr. Davidson, through
18 his counsel, undertook efforts to plant a patently false story in the *Wall Street Journal* stating that Ms.
19 Clifford was not being cooperative with investigators from the Southern District of New York looking
20 into business dealings of Mr. Cohen. This conduct is yet further evidence of Mr. Davidson's breach of
21 fiduciary duty directed at Ms. Clifford.

22 60. Ms. Clifford has been damaged in this and other ways, including having to incur
23 substantial costs and fees, in an amount to be proven at trial, but which are well in excess of \$100,000.

24
25 ///

26
27 ///

FIRST CAUSE OF ACTION

Breach of Fiduciary Duty

(Against Defendant Davidson)

61. Plaintiff restates and re-alleges each and every allegation in Paragraphs 1 through 60 above as if fully set forth herein.

62. Mr. Davidson, by virtue of his role as Ms. Clifford's attorney, owed Ms. Clifford fiduciary duties at all material times.

63. These duties include, but are not limited to, a duty of loyalty and a duty to maintain client confidences.

64. These duties exist both during his representation of Ms. Clifford and continue thereafter.

65. Mr. Davidson breached his fiduciary duty to Ms. Clifford in numerous ways detailed herein.

66. By way of example, in the year 2018, Mr. Davidson engaged in numerous communications and concerted action with Mr. Cohen, the purpose of which was not to benefit Ms. Clifford, but to benefit Mr. Cohen and Mr. Trump.

67. As alleged herein, in or about January of 2018, Defendants discussed and attempted to arrange at least one media appearance on Mr. Hannity's *Fox News* show, the purpose of which was not to allow Ms. Clifford to truthfully tell her story, but for her appearance to benefit Mr. Trump by controlling the media coverage resulting from an *In Touch* magazine article that had just been released.

68. Mr. Davidson never obtained Ms. Clifford's permission or authorization to engage in these discussions or disclose any information to Mr. Cohen.

69. Mr. Davidson's actions were designed to benefit Mr. Cohen and Mr. Trump, not Ms. Clifford, and thus Mr. Davidson breached his duty of loyalty.

70. Mr. Davidson also breached his duties to Ms. Clifford by disclosing confidential information regarding Ms. Clifford's anticipated legal strategy to Mr. Cohen in or about February and March of 2018.

73. In engaging in this conduct, Mr. Davidson knew he was violating his duties and did so anyway and acted with malice, oppression, or fraud, and is thus also responsible for punitive damages in an amount to be proven at trial according to proof.

Aiding and Abetting Breach of Fiduciary Duty (Against Defendant Cohen)

79. Mr. Cohen further communicated with Mr. Davidson and encouraged Mr. Davidson to disclose confidential information pertaining to Ms. Clifford's legal strategy – information that, as an attorney, he knew Mr. Davidson should keep confidential. Mr. Cohen then proceeded to record this

1 information and retain the recordings, all as part of his substantial assistance aimed at aiding and
2 abetting Mr. Davidson's breaches of fiduciary duty.

3 80. Mr. Cohen used this information for his own benefit and Mr. Trump's benefit by
4 attempting to initiate an arbitration proceeding against Ms. Clifford and force her to remain silent. He
5 further used this information in an effort to "get out in front" of the story and deceive Mrs. Trump.

6 81. Ms. Clifford has been damaged by Mr. Cohen's misconduct in an amount to be proven
7 at trial, but which exceeds \$100,000.

8 82. In engaging in this conduct, Mr. Cohen acted with malice, oppression, or fraud, and is
9 thus also responsible for punitive damages in an amount to be proven at trial according to proof.

10
11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows
13

14 **ON THE FIRST CAUSE OF ACTION**

- 15 1. For damages in an amount to be proven at trial;
16 2. For turnover of Ms. Clifford's entire client file and of all text messages and
17 correspondence relating to her;
18 3. For punitive damages;
19 4. For pre-judgment and post-judgment interest;
20 5. For costs of suit, including attorney's fees; and
21 6. For such other and further relief as the Court may deem just and proper.
22

23 **ON THE SECOND CAUSE OF ACTION**

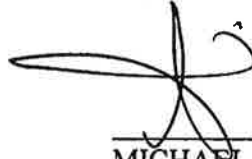
- 24 1. For damages in an amount to be proven at trial;
25 2. For punitive damages;
26 3. For pre-judgment and post-judgment interest;
27 4. For costs of suit, including attorney's fees; and
28 5. For such other and further relief as the Court may deem just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff demands a trial by jury on all causes so triable.

DATED: June 6, 2018

AVENATTI & ASSOCIATES, APC



MICHAEL J. AVENATTI
Attorneys for Plaintiff

EXHIBIT A

| Participants | From | Body | Timestamp: Time |
|---|--|--|------------------------------|
| +1310936XXXX Keith Davidson Private (owner) A5 +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Call me | 1/17/2018 12:13:09 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | I have her tentatively scheduled for Hannity tonight. Call me after your trial | 1/17/2018 2:32:23 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | She cannot don't today. She is flying to LA tomorrow. I'm trying to get her to commit for tomorrow | 1/17/2018 3:21:27 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | It's really important. Why? | 1/17/2018 3:23:09 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Can you call me please | 1/17/2018 3:25:34 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Please call me | 1/17/2018 3:45:38 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Anything? | 1/17/2018 4:18:57 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Still trying | 1/17/2018 4:30:06 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | This is no good. We need her as by doing tomorrow you just create another news cycle instead of putting an end to this one | 1/17/2018 4:30:43 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Please call me | 1/17/2018 4:52:42 PM(UTC-5) |

| Participants | From | Body | Timestamp: Time |
|--|--|--|-----------------------------|
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Cmon! | 1/17/2018 5:01:21 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Let's forget tonight. They would rather tomorrow so they can promote the heck out of the show | 1/17/2018 5:31:44 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Keith, The wise men all believe the story is dying and don't think it's smart for her to do any interviews. Let her do her thing but no interviews at all with anyone | 1/17/2018 7:51:43 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | 100% | 1/17/2018 7:52:21 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Thanks pal | 1/17/2018 7:52:44 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Just no interviews or statements unless through you | 1/17/2018 7:53:08 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Got it | 1/17/2018 7:54:45 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Call me | 3/1/2018 10:18:31 AM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Busy? | 3/2/2018 3:12:57 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | 15 minutes we should speak | 3/2/2018 3:21:56 PM(UTC-5) |

| Participants | From | Body | Timestamp: Time |
|--|--|--|----------------------------|
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Call when u can | 3/2/2018 3:34:21 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | Exactly 4 and I will have Larry Rosen on the line as well | 3/2/2018 3:56:16 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | Great | 3/2/2018 3:57:59 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1310936XXXX Keith Davidson Private | U calling? | 3/2/2018 4:14:54 PM(UTC-5) |
| +1310936XXXX Keith Davidson Private (owner) +1646853XXXX Michael Cohen | +1646853XXXX Michael Cohen | With flotus. Give me a minute | 3/2/2018 4:15:13 PM(UTC-5) |

EXHIBIT C

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All

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Movies, TV
Shows & EpisodesCelebrities, Actors
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Stormy Daniels

[Actress](#) | [Writer](#) | [Director](#)
[SEE RANK](#)

Stormy Daniels was born on March 17, 1979 in Baton Rouge, Louisiana, USA as Stephanie Gregory Clifford. She is an actress and writer, known for [The 40-Year-Old Virgin](#) (2005). She has been married to [Brendon Miller](#) since November 25, 2015. They have one child. She was previously married to [Mike Moz](#) and [Pat Myne](#). [See full bio](#) »

Born: [March 17, 1979](#) in [Baton Rouge, Louisiana, USA](#)

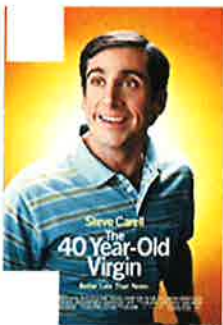
[More at IMDbPro](#) »

[Contact Info:](#) [View agent, publicist, legal on IMDbPro](#)

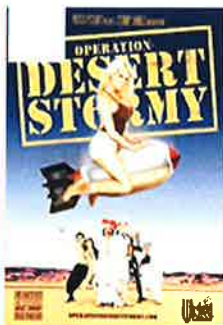
[13 photos](#) | [4 videos](#) »

10 wins & 32 nominations. [See more awards](#) »

Known For



[The 40-Year-Old Virgin](#)
Porn Star
(2005)



[Operation: Desert Stormy](#)
Rachel
(2007)



[Camp Cuddly Pines Powe...](#)
Kirsten
(2005)



[Switch Actress](#)
(2013)

Filmography

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[Department](#) | [Stunts](#) | [Thanks](#) | [Self](#) | [Archive footage](#)

Actress (152 credits)

[Stormy's Secret](#) (Video)

2018

[Unbridled](#) (Video)
Avery Montgomery

2017

[The Madam](#) (Video)
Ashley

2016

[The Soul Man](#) (TV Series)
- [This Mud's for You](#) (2016) ... (as Stormy)

2016

[Sexbots: Programmed for Pleasure](#) (Video)
Stormy Daniels Doll

2016

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Thu, Nov 08 4:00 PM PST on IFC (125)

[The 40-Year-Old Virgin](#)

Fri, Nov 09 12:30 AM PST on IFC (125)

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a list of 22 people
created 23 Sep 2012



Famous Celebrities Who Started Career As A Porn Star

a list of 30 people
created 15 Jun 2014

listem1

a list of 261 people
created 8 months ago

| | |
|--|--------|
| Off Limits (Video) | 2015 |
| Tina (uncredited) | |
| Wanted (Video) | 2015 |
| Dani | |
| Deception (Video) | 2015/I |
| Rachel Taylor -NonSex Role | |
| Impulse (Video) | 2015 |
| April | |
| Girls Night (Video) | 2015 |
| Erica | |
| Pretty Dangerous (Video) | 2015 |
| Ivy Black | |
| Screw You (Video) | 2014 |
| Dirty Deeds (Video) | 2014 |
| Carrie | |
| The Bait (Video) | 2014 |
| Brenna | |
| The Real Thing (Video) | 2014 |
| Vicky / Real Doll | |
| Right Amount of Wrong (Video) | 2014 |
| Sleeping Beauty: An Axel Braun Parody (Video) | 2014 |
| Maleficent | |
| Nothin' But Trouble (Video) | 2014 |
| Crime of Passion (Video) | 2014 |
| Cynthia | |
| Nymphos (Video) | 2013 |
| Switch (Video) | 2013 |
| The Ring (Video) | 2013 |
| Stripper -NonSex Role | |
| Wanderlust (Video) | 2013 |
| Rebound (Video) | 2013 |
| TV Host Kathy -NonSex Role | |
| Change of Heart (Video) | 2013 |
| Lori -NonSex Role | |
| Divorcees (Video) | 2013 |
| Leanne | |
| Talking Shop (Video) | 2013 |
| Unfaithful (Video) | 2012 |
| Tasha | |
| First Crush (Video) | 2012 |
| Immortal Love (Video) | 2012 |
| Snatched (Video) | 2012 |
| Sam | |
| The Perfect Partner (Video) | 2012 |
| Andrea | |
| Blow (Video) | 2012 |
| Blind Date (Video) | 2011 |
| Happy Endings (Video) | 2011 |
| Alexis | |
| The Escort (Video) | 2011 |
| Theresa | |
| Bikini Kitchen: Best of Stormy (Video short) | 2011 |
| The Life of Riley (Video) | 2011 |
| Riley | |
| Fairy Tale (Video) | 2010 |
| Jill | |



Actresses

a list of 288 people
created 7 months ago

Celebrities I am sick of, hate, despise, loathe, revile, deprecate, abhor, execrate, detest, spurn, dislike, nauseate, disapprove of, (or just don't care about) most

a list of 326 people
created 08 Sep 2014

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How Much Have You Seen?

How much of [Stormy Daniels's work](#) have you seen?

User Polls



Most memorable movie poster of the last 10 years ...



Same tag-line for a different movie ...



Grammatically Incorrect Movie Titles



Which film with a number digit in the title do you like best?



Fictional Underdogs in Movies



I Would Walk 500 Miles and I Would Walk 500 More...

| | |
|---|------|
| Love in an Elevator (Video) | 2010 |
| Sex Therapy (Video) Anika Crawford | 2010 |
| The Chatroom (Video) (uncredited) | 2010 |
| The Honeymoon (Video) | 2010 |
| Whatever It Takes (Video) Amber | 2010 |
| Partly Stormy (Video) | 2010 |
| Sex Lies & Spies (Video) Raven | 2010 |
| Wrong Side of Town (Video) Stormy | 2010 |
| What Went Wrong (Video) Vicki | 2010 |
| Forbidden (Video) | 2009 |
| Dirty Minds (Video) Office Girl | 2009 |
| Reinvented (Video) Beth | 2009 |
| Tormented (Video) Tormented Woman / Alice - Sex Scene #6 | 2009 |
| Operation: Tropical Stormy (Video) Rachel | 2009 |
| Model Behavior (Video) Debra Ann Henderson | 2009 |
| House of Wicked (Video) | 2009 |
| The Lifestyle (Video) Allison | 2009 |
| Party Down (TV Series) Macy - Sin Say Shun Awards Afterparty (2009) ... Macy | 2009 |
| Predator III: The Final Chapter (Video) The Predator | 2009 |
| The Wicked (Video) Baby Lee Johnson | 2009 |
| Finding Bliss Stormy Daniels | 2009 |
| The Price of Lust (Video) Katherine | 2009 |
| Stormy's Favorites (Video) | 2008 |
| One Wild & Crazy Night (Video) The Porn Star | 2008 |
| Two (Video) Linda / Tess | 2008 |
| Bound (Video) Lily | 2008 |
| Predator II: The Return (Video) The Predator | 2008 |
| Playgirl: Heavenly Heat (Video) | 2007 |
| Saint Francis Strawberry (as Stormy) | 2007 |
| Last Night (Video) Sondra | 2007 |
| Operation: Desert Stormy (Video) Rachel | 2007 |
| Black Widow (Video) Peyton | 2007 |

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| | |
|---|---------|
| The Muse (Video) Model / Dancer / Flower Girl | 2007 |
| The One (Video) Jennifer | 2007/II |
| The Predator (Video) The Predator | 2007 |
| Knocked Up Lap Dancer | 2007 |
| Driven (Video) Jennifer | 2007 |
| Dirt (TV Series) Stormy - Bogan (2007) ... Stormy - Pilot (2007) ... Stormy | 2007 |
| Sleeping Around (Video) | 2006 |
| Watching Samantha (Video) Samantha | 2006 |
| Mind of Mencia (TV Series) Porn Star - Episode #2.15 (2006) ... Porn Star | 2006 |
| Taken (Video) Anna Spencer | 2006 |
| 3 Wishes (Video) Angelina | 2006 |
| American Dreams (Video) | 2005 |
| Forever Stormy (Video) | 2005 |
| Internal Affairs: From the Files of Valley 911 (Video) Officer Daniels | 2005 |
| Jenna's Star Power (Video) NonSex | 2005 |
| Neighbors (Video) Miranda | 2005 |
| Private Eyes (Video) Stacey | 2005 |
| Second Thoughts (Video) Caitlyn | 2005 |
| The Closer (Video) | 2005 |
| What's a Girl Gotta Do? (Video) Aimee | 2005 |
| What Are Friends For? (Video) | 2005 |
| Zdenka & Friends (Video) | 2005 |
| Eternity (Video) Silvia / The Bride | 2005 |
| Camp Cuddly Pines Powertool Massacre (Video) Kirsten | 2005 |
| The Witches of Breastwick (Video) Felicia | 2005 |
| The 40-Year-Old Virgin Porn Star | 2005 |
| Lovers Lane (Video) Party Attendee (uncredited) | 2005 |
| Spreading My Seed (Video) | 2005 |
| Secrets of the Velvet Ring (Video) Nadia | 2005 |
| Band Camp (Video) Amber (as Stormy) | 2004 |
| I Know What You Did Last Night (Video) | 2004 |

| | |
|---|------|
| Matrix Pornstars (Video) | 2004 |
| Men Only's Gorgeous All Girls (Video) | 2004 |
| Porking with Pride 2 (Video) | 2004 |
| Portrait (Video) | 2004 |
| Slave to Love (Video) Secretary | 2004 |
| Toxxxic Cumloads 6 (Video) | 2004 |
| Wicked Divas: Stormy (Video) | 2004 |
| The Perfect Stormy (Video) (as Stormy) | 2004 |
| Highway (Video) Tanya | 2004 |
| About a Woman (Video) (as Stormy) | 2003 |
| Angels of Mercy (Video) Kelly (as Stormy Waters) | 2003 |
| Beautiful (Video) Sondra White (as Stormy) | 2003 |
| Cargo (Video) Meghan Baxter (as Stormy) | 2003 |
| Island Fever 2 (Video) | 2003 |
| Island Girls (Video) (as Stormy) | 2003 |
| Kink (Video) NonSex | 2003 |
| Lost and Found (Video) NonSex | 2003 |
| Photo Club (Video) | 2003 |
| Pin Ups (Video) (as Stormy) | 2003 |
| Pornstar (Video) Krystal Coxx (as Stormy) | 2003 |
| Princess (Video) | 2003 |
| Pussy Sweat (Video) (as Stormy) | 2003 |
| Ron Jeremy on the Loose: Atlantic City (Video) NonSex | 2003 |
| Skin Deep (Video) Julie (as Stormy) | 2003 |
| Without You (Video) | 2003 |
| Young & Anal (Video) | 2003 |
| Suspicious Minds (Video) Rachel (as Stormy) | 2003 |
| Space Nuts (Video) Princess Hubba Hubba (as Stormy) | 2003 |
| Naked Hollywood 17: Lights, Camera, Action (Video) | 2003 |
| Falling from Grace (Video) Christy (as Stormy) | 2003 |
| Not a Romance (Video) Marissa (as Stormy) | 2003 |
| Behind the Scenes of 'Dripping Wet Sex' (Video) | 2002 |
| Best Friends (Video) Joanne (as Stormy) | 2002 |
| Breast Friends 2 (Video) | 2002 |
| Dripping Wet Sex 4 (Video) | 2002 |
| Dumb Blonde (Video) Stormy (as Stormy) | 2002 |
| Finally Legal 7 (Video) | 2002 |

| | |
|---|------------------------|
| Grand Opening (Video) | 2002 |
| Dorm Girl #1 (as Stormy) | |
| Splendor (Video) (as Stormy) | 2002 |
| Trailer Trash Nurses 6 (Video) | 2002 |
| When the Boyz Are Away the Girlz Will Play 7 (Video) | 2002 |
| Busty Beauties 2 (Video) | 2002 |
| Super Star | |
| Love Potion 69 (Video) | 2002 |
| Cupid's Arrow (Video) | 2002 |
| Waitress / Masseuse | |
| Hot Showers 6 (Video) (as Stormy) | 2002 |
| American Girls 2 (Video) (as Stormy Waters) | 2002 |
| Heat (Video) | 2002 |
| Charlotte (as Stormy) | |
| Class Act (Video) (as Stormy) | 2002 |
| Voluptuous 3 (Video) | 2002 |
| Stormy | |
| Big Busted Goddesses of Las Vegas (Video) (as Stormy Waters) | 2000 |
| Writer (85 credits) | Hide ▲ |
| Never Forgotten (Video) (writer) | 2018 |
| One Step Ahead (Video) (writer) | 2017 |
| Unbridled (Video) (writer) | 2017 |
| The Driver (Video) (writer) | 2017 |
| From the First Moment (Video) | 2016 |
| The Madam (Video) (writer) | 2016 |
| Reunited (Video) (writer) | 2016 |
| Indiscretions (Video) (writer) | 2016 |
| Along for the Ride (Video) (writer) | 2016 |
| Trouble x2 (Video) | 2016 |
| Win a Date with Sofia Blake (Video) (writer) | 2016 |
| Weekend to Remember (Video) | 2016 |
| Facade (Video) (writer) | 2016 |
| Off Limits (Video) (writer) | 2015 |
| Wanted (Video) | 2015 |
| Deception (Video) (writer) | 2015/I |
| Girlfriends (Video) | 2015 |
| Impulse (Video) (writer) | 2015 |
| Bad Advice (Video) (writer) | 2015 |
| Perfect Timing (Video) (written by) | 2015 |
| Girls Night (Video) (written by) | 2015 |
| Pretty Dangerous (Video) (written by) | 2015 |
| Getting Cozy (Video) (written by) | 2015 |
| When It Comes to You (Video) (written by) | 2014 |
| Dirty Deeds (Video) (written by) | 2014 |
| The Bait (Video) (written by) | 2014 |
| Waiting on Love (Video) (written by) | 2014 |
| The Real Thing (Video) (written by) | 2014 |
| Right Amount of Wrong (Video) (written by) | 2014 |

| | |
|---|---------|
| Love and Loss (Video) (written by) | 2014 |
| Feeling Lucky? (Video) (writer) | 2014 |
| Nothin' But Trouble (Video) (written by) | 2014 |
| At First Sight (Video) (written by) | 2014 |
| Crime of Passion (Video) (written by) | 2014 |
| Switch (Video) (written by) | 2013 |
| Sex Door Neighbors (Video) (written by) | 2013 |
| Wanderlust (Video) (written by) | 2013 |
| Rebound (Video) (written by) | 2013 |
| Change of Heart (Video) (written by) | 2013 |
| Divorcees (Video) (written by) | 2013 |
| Talking Shop (Video) (written by) | 2013 |
| If You Only Knew (Video) (written by) | 2013 |
| Unfaithful (Video) (written by) | 2012 |
| First Crush (Video) (written by) | 2012 |
| Immortal Love (Video) (written by) | 2012 |
| Snatched (Video) (written by) | 2012 |
| The Perfect Partner (Video) (written by) | 2012 |
| Blow (Video) (written by) | 2012 |
| Blind Date (Video) (written by) | 2011 |
| Heart Strings (Video) (written by) | 2011 |
| Happy Endings (Video) (writer) | 2011 |
| The Escort (Video) (written by) | 2011 |
| The Fate of Love (Video) (written by) | 2011 |
| Teacher's Pet (Video) (written by) | 2011 |
| Sex Therapy (Video) (writer) | 2010 |
| The Honeymoon (Video) (written by) | 2010 |
| Whatever It Takes (Video) | 2010 |
| Partly Stormy (Video) (screenplay) | 2010 |
| Reinvented (Video) (written by) | 2009 |
| Operation: Tropical Stormy (Video) (written by) | 2009 |
| The Lifestyle (Video) (written by) | 2009 |
| Predator III: The Final Chapter (Video) (written by) | 2009 |
| Whack Job (Video) (written by) | 2009 |
| The Price of Lust (Video) (uncredited) | 2009 |
| One Wild & Crazy Night (Video) (written by) | 2008 |
| Bound (Video) (screenplay) | 2008 |
| Predator II: The Return (Video) (written by) | 2008 |
| Operation: Desert Stormy (Video) (written by) | 2007 |
| The One (Video) (written by) | 2007/II |
| The Predator (Video) (written by) | 2007 |
| For Love, Money or a Green Card (Video) (written by) | 2007 |
| Watching Samantha (Video) (written by) | 2006 |
| Gossip (Video) (written by) | 2006 |
| Taken (Video) | 2006 |
| 3 Wishes (Video) | 2006 |

| | |
|---|------------------------|
| Neighbors (Video) (writer) | 2005 |
| Private Eyes (Video) | 2005 |
| Second Thoughts (Video) (written by) | 2005 |
| Camp Cuddly Pines Powertool Massacre (Video) (screenplay by) | 2005 |
| Lovers Lane (Video) (written by) | 2005 |
| Highway (Video) (screenplay) | 2004 |
| Cargo (Video) (writer - as Stormy) | 2003 |
| Kink (Video) | 2003 |
| Without You (Video) | 2003 |
| Suspicious Minds (Video) (written by - as Stormy) | 2003 |
| Director (82 credits) | Hide ▲ |
| Highway Home (Video) | 2018 |
| Never Forgotten (Video) | 2018 |
| One Step Ahead (Video) | 2017 |
| Unbridled (Video) | 2017 |
| From the First Moment (Video) | 2016 |
| Karma (Video) | 2016 |
| The Madam (Video) | 2016 |
| Indiscretions (Video) | 2016 |
| Trouble x2 (Video) | 2016 |
| Win a Date with Sofia Blake (Video) | 2016 |
| Weekend to Remember (Video) | 2016 |
| Off Limits (Video) | 2015 |
| Wanted (Video) | 2015 |
| Deception (Video) | 2015/I |
| Girlfriends (Video) | 2015 |
| Impulse (Video) | 2015 |
| Behind the Scenes (Video) | 2015 |
| Perfect Timing (Video) | 2015 |
| Girls Night (Video) | 2015 |
| Pretty Dangerous (Video) | 2015 |
| Getting Cozy (Video) | 2015 |
| When It Comes to You (Video) | 2014 |
| Dirty Deeds (Video) | 2014 |
| Waiting on Love (Video) | 2014 |
| The Real Thing (Video) | 2014 |
| Right Amount of Wrong (Video) | 2014 |
| Love and Loss (Video) | 2014 |
| Feeling Lucky? (Video) | 2014 |
| Haunted Hearts (Video) | 2014 |
| Nothin' But Trouble (Video) | 2014 |
| At First Sight (Video) | 2014 |
| Crime of Passion (Video) | 2014 |
| Nymphs (Video) | 2013 |
| Switch (Video) | 2013 |
| The Ring (Video) | 2013 |

| | |
|--|------|
| Sex Door Neighbors (Video) | 2013 |
| Wanderlust (Video) | 2013 |
| Rebound (Video) | 2013 |
| Change of Heart (Video) | 2013 |
| Divorcees (Video) | 2013 |
| Talking Shop (Video) | 2013 |
| If You Only Knew (Video) | 2013 |
| Unfaithful (Video) | 2012 |
| Immortal Love (Video) | 2012 |
| Snatched (Video) | 2012 |
| The Perfect Partner (Video) | 2012 |
| Blow (Video) | 2012 |
| Blind Date (Video) | 2011 |
| Heart Strings (Video) | 2011 |
| Happy Endings (Video) | 2011 |
| The Escort (Video) | 2011 |
| The Fate of Love (Video) | 2011 |
| Inside Job (Video) | 2011 |
| Teacher's Pet (Video) | 2011 |
| Girlfriend for Hire (Video) | 2011 |
| Love in an Elevator (Video) | 2010 |
| Sex Therapy (Video) | 2010 |
| The Chatroom (Video) | 2010 |
| The Honeymoon (Video) | 2010 |
| Whatever It Takes (Video) | 2010 |
| Partly Stormy (Video) | 2010 |
| Just You and Me (Video) | 2010 |
| Couples Camp (Video) | 2010 |
| Forbidden (Video) | 2009 |
| Dirty Minds (Video) | 2009 |
| Reinvented (Video) | 2009 |
| Operation: Tropical Stormy (Video) | 2009 |
| The Lifestyle (Video) | 2009 |
| Predator III: The Final Chapter (Video) | 2009 |
| Whack Job (Video) | 2009 |
| The Price of Lust (Video) | 2009 |
| One Wild & Crazy Night (Video) | 2008 |
| Predator II: The Return (Video) | 2008 |
| Operation: Desert Stormy (Video) | 2007 |
| The Predator (Video) | 2007 |
| For Love, Money or a Green Card (Video) | 2007 |
| Sleeping Around (Video) | 2006 |
| Gossip (Video) | 2006 |
| 3 Wishes (Video) | 2006 |
| Private Eyes (Video) | 2005 |
| Second Thoughts (Video) | 2005 |

One Night in Vegas (Video)

2004

Producer (5 credits)

Hide ▲

Trouble x2 (Video) (producer)

2016

Weekend to Remember (Video) (producer)

2016

Waiting on Love (Video) (producer)

2014

Forbidden (Video) (producer)

2009

Whack Job (Video) (producer)

2009

Art director (4 credits)

Show ▼

Costume and Wardrobe Department (1 credit)

Show ▼

Stunts (1 credit)

Show ▼

Thanks (1 credit)

Show ▼

Self (34 credits)

Show ▼

Archive footage (78 credits)

Show ▼

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Personal Details

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Other Works: (2/07) "Penthouse" Magazine's Pet of the Month. [See more »](#)
Publicity Listings: 1 Print Biography | 1 Interview | 19 Articles | 6 Pictorials | 7 Magazine Cover Photos | [See more »](#)
Official Sites: [Instagram](#) | [Official Site](#) | [See more »](#)
Alternate Names: Stormy | Stormy Waters

Height: 5' 7" (1.7 m)

Did You Know?

[Edit](#)

Personal Quote: [7/4/09, in a speech criticizing [David Vitter](#), a married Republican Senator from Louisiana who portrayed himself as a "family values" Christian but was forced to admit that he regularly used prostitutes from a service run by a woman known as the "D.C. Madam"] I might not be the epitome of family values. But I can tell you one thing: I wouldn't humiliate my spouse and children like the current ... [See more »](#)

Trivia: In 2018 reports surfaced that she allegedly had an affair with Donald Trump in 2006 and had to sign a non-disclosure agreement about it. As of yet, no evidence has been presented to support this claim. With the revelation of the alleged affair, Trump considered suing her. [See more »](#)

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WIKIPEDIA

Stormy Daniels

Stormy Daniels^[5] (born March 17, 1979 as **Stephanie Gregory Clifford**),^{[1][6]} also known professionally as **Stormy Waters**, or simply **Stormy**, is an American pornographic actress, stripper, screenwriter,^[7] and director. She has won numerous industry awards, and is a member of the *NightMoves*, *AVN* and *XRCO* Halls of Fame.^{[8][9][10]} In 2009, a recruitment effort led her to consider challenging incumbent David Vitter for the 2010 Senate election in her native Louisiana.^[11]

In 2018, Daniels became involved in a legal dispute with U.S. President Donald Trump and his attorney Michael Cohen. Trump and his surrogates paid \$130,000 hush money to silence Daniels about an affair she said she had with Trump in 2006. Trump's spokespersons have denied the affair and accused Daniels of lying.

Stormy Daniels



Daniels in January 2015

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Early life

Stephanie Gregory was born on March 17, 1979,^{[1][2]} to Sheila and Bill Gregory, who divorced about 3 or 4 years later. Gregory was subsequently raised by her mother.^{[12][13]}

She graduated from Scotlandville Magnet High School in Baton Rouge in 1997 and considered becoming a journalist.^[13]

Born

Stephanie A. Gregory Clifford^[1]
March 17, 1979^[2]
Baton Rouge, Louisiana, U.S.

Other names

Stormy, Stormy Waters, Stephanie Clifford

Known for

Stormy Daniels–Donald Trump scandal

Political party

Republican^{[3][4]}
Democratic (before 2010)

Spouse(s)

Pat Myne (m. 2003; div. 2005)
Mike Moz (m. 2007; div. 2009)
Brendon Miller (m. 2010; sep. 2018)

Children

1

Website

www.stormydaniels

Career



Porn star Ron Jeremy and Daniels at Jeremy's birthday party, March 2007

During high school, Daniels had a job answering phones at a riding stable. Daniels's first experience as a stripper occurred when she was 17 and visiting a friend at a strip club; she was convinced to perform a "guest set."^[13] She began stripping for money at the Gold Club in Baton Rouge^{[13][15]} and became a featured entertainer with Continental Theatrical Agency in September 2000.^[16] She chose her stage name Stormy Daniels to reflect her love of Mötley Crüe, whose bassist, Nikki Sixx, named his daughter Storm.^{[4][17]} She is from Louisiana and chose the last name "Daniels" after seeing a Jack Daniel's advertisement that read "a Southern favorite".^[18]

While working as a featured entertainer, Daniels met Devon Michaels, who was doing lesbian scenes in a pair of upcoming films – one for Wicked Pictures and one for Sin City – and Michaels invited Daniels to accompany her. Daniels accompanied Michaels to her Wicked shoot, where she met Brad Armstrong and co-starred with Michaels in her Sin City scene, *American Girls Part 2*. Afterwards, Armstrong invited Daniels to stay with him.^[19]

In July 2002, Daniels was cast as the lead in a feature film for Wicked Pictures, *Heat*, where she did her first lesbian scene. In September that year, she signed an exclusive contract with Wicked.^[19] In 2004, she won the Best New Starlet Award from *Adult Video News*, which was a complete surprise to Daniels, as she was so sure Jesse Jane would win she made a \$500 bet with another porn actress.^[20] She has directed for Wicked since 2004.^[21]

Daniels was inducted into the AVN Hall of Fame on January 18, 2014,^[9] and was inducted into the XRCO Hall of Fame on April 16, 2014.^[10] Her directorial work that year earned fourteen AVN Award nominations including a nomination for Best Safe Sex Scene for her performance with Brendon Miller in François Clousot's *First Crush*.^[9]

In 2018, Daniels toured strip clubs as part of a "Make America Horny Again" tour.^{[22][23][24]} She was given the key to the city of West Hollywood, California, on "Stormy Daniels Day", May 23, 2018.^[25] Daniels was named to host the 2019 XBIZ Awards.^[26]

Mainstream appearances

United States

Daniels appeared in an episode of *Real Sex* where she is seen participating in 2001 Miss Nude Great Plains Contest.^[27] She appeared in *Pornucopia* in 2004.^[28] In early 2007, she appeared in *Dirt* on the FX Network, where she played a stripper who helps to set up a basketball player played by Rick Fox.^[29] Later in 2007, Daniels appeared in Maroon 5's music video for their song "Wake Up Call" as a pole dancer. She appears in the film *The 40-Year-Old Virgin* (2005), when the main character (Steve Carell) watches her in the video *Space Nuts: Episode 69—Unholy Union* and then tries dreaming about her. She appears in the film *Knocked Up* (2007) as a lap dancer.^[30] She appeared on *Saturday Night Live* as herself on May 5, 2018.^[30] She appeared as a model in artist Nika Nesgoda's 2002 photographic series, *Virgin*, portraying the Virgin Mary.^[31]

In 2018, there was wide speculation that Daniels would be a housemate on *Celebrity Big Brother 22* in the United Kingdom. Although she had tweeted on several occasions that she was not going on the show, there were claims that she would be paid £750,000 for just one week in the house – making her the highest paid housemate in the show's history.^[32] Despite the reports, Daniels did not enter the house on launch night.^[33]

Speculation for her absence included demands for more money, a legal affair involving her husband and a desire to spend time with her daughter. Her attorney, Michael Avenatti, told the *Press Association* that Daniels was in fact set to enter the house, but producers attempted to manipulate her into acting a certain way.^[34]

A *Big Brother* statement read: "Stormy Daniels was booked to appear on the show several months ago and hours before the show was due to go live, informed the production team that she no longer wished to enter the house as previously agreed. Producers discussed a variety of options with her but were unable to agree any acceptable conditions for her entering the house. Our focus is now on making a brilliant series with our fantastic celebrities."^[35]^[36]

Daniels said that she offered to appear on the show during the live launch to explain her absence, but was turned down by producers.^[37]

On the August 17 edition of spin-off show *Big Brother's Bit on the Side*, host Rylan Clark-Neal explained that just five hours before the first live show, Daniels said she only wanted to appear on launch night and then leave. *Big Brother* tried to negotiate a compromise, but nothing came of it. Clark-Neal also insisted that money was not a factor and there was no attempt from producers to try to manipulate her to achieve a specific outcome.^[38]

Politics

A group of fans attempted to recruit Daniels to run against Republican Senator David Vitter in Louisiana in 2010.^[11] The recruitment process was centered around the website *DraftStormy.com*.^[39] On May 21, 2009, she formed an exploratory committee,^[40] initially inspired by revelations about "Vitter's connections to a prostitution ring".^[41] In August 2009, her campaign manager's car was blown up, although no one was in the car at that time.^[42]

In April 2010, Daniels finally declared herself a Republican candidate. Her decision was inspired by disclosures that the Republican National Committee (RNC) had paid expenses for fundraisers at a "lesbian bondage themed nightclub" in Los Angeles, stating that the revelations "finally tipped the scales".^[3] She explained that the RNC's use of party funds for sex convinced her that Republicans represented her libertarian values best: Daniels said she has been a registered Democrat throughout her life, "But now I cannot help but recognize that over time my libertarian values regarding both money and sex and the legal use of one for the other is now best espoused by the Republican Party."^[41]



Daniels in 2010

She made several listening tours around Louisiana to focus on the economy, as well as women in business and child protection^[43] and stated that if elected, she would likely retire from the adult industry.^[44] She announced on April 15, 2010, that she would not be running for Senate, saying she could not afford a run for the Senate seat and stating that the media never took her candidacy seriously.^[45]

Personal life

Daniels lives in Forney, Texas,^[4] and was previously married to Pat Myne from 2003 to 2005, and Michael Mosny (screen name Mike Moz) from 2007 to 2009.^[46] Daniels was arrested in July 2009 pertaining to a domestic violence charge by Mosny.^[47]

Daniels married Glendon Crain (screen name Brendon Miller), in 2010; they have a daughter,^[48] Caden.^[49] Crain filed for divorce in July 2018.^[50]

Daniels has been fond of horses her entire life; she owns several and has won multiple blue ribbons at equestrian events.^{[13][51]}

Legal affairs

Trump affair allegations

In October 2016, shortly before the presidential election, Donald Trump's personal lawyer, Michael Cohen, paid Daniels \$130,000 in hush money to deny that she had an affair with Trump a decade earlier in 2006.^{[52][53][54]} Trump's spokespersons have denied the affair and accused Daniels of lying.^{[55][56]} On behalf of his client, Cohen denied the existence of an affair between Trump and Daniels,^[57] but he later stated: "In a private transaction in 2016, I used my own personal funds to facilitate a payment of \$130,000 to Ms. Stephanie Clifford."^[58]

On March 6, 2018, Daniels filed a lawsuit against Trump. She said that the non-disclosure agreement that she had signed in reference to the alleged affair was invalid because Trump had never personally signed it. The suit also alleges that Trump's attorney had been trying to intimidate Daniels and "scare her into not talking". A day later, Cohen initiated an ex parte arbitration process which resulted in an order that barred Daniels from disclosing "confidential information" related to the non-disclosure agreement. The order itself, which Daniels' lawyers called bogus, was supposed to remain confidential.^[59]

In a March 25, 2018, interview with *60 Minutes*, Daniels said that she and Trump had sex once, and that later she had been threatened in front of her infant daughter and felt pressured to later sign a non-disclosure agreement.^{[60][61]}

On April 9, 2018, FBI agents raided Cohen's office and seized emails, tax documents and business records relating to several matters, including payments to Daniels.^[62]

On April 30, 2018, Daniels filed a lawsuit against Trump on libel charges because he called her statements "fraud". It relates to Trump's statements on Twitter saying that Clifford had invented the story of the man who threatened her after she decided to tell journalists about their affair.^[63] The suit was dismissed on First amendment grounds.^[64]

In August 2018, Cohen reached a plea deal with prosecutors, saying he paid off Daniels "at the direction of the ... candidate" and "for the principal purpose of influencing the election".^[4] In September 2018, Cohen offered to invalidate the non-disclosure agreement with Daniels if she would refund the \$130,000 Cohen's company paid to her.^{[65][66]} Lawyers for Trump have declared that Trump will neither enforce the non-disclosure agreement nor contest Daniels' claim that it is invalid.^[67]

Columbus, Ohio arrest

On July 12, 2018, Daniels was arrested in Columbus, Ohio, by undercover vice cops in a sting operation.^[68] Authorities accused her of "fondling" patrons and police officers in violation of Ohio strip club law.^[69] While Daniels was booked into the county jail, two other female adult entertainers who were arrested at the club for the same alleged violations were

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given summonses to appear in court and (unlike Daniels) did not have their mugshots taken.^[70] Daniels retained Columbus defense lawyer Chase Mallory,^[71] who worked with prosecutors to dismiss the charges less than 12 hours later, saying that the law did not apply to out-of-town performers.^[72]

Daniels' personal attorney, Michael Avenatti, vowed to sue the local police on the ground that the arrest was politically motivated.^[73] It was later revealed that the lead detective on the vice squad in charge of the arrest was a heavy supporter of Donald Trump.^[74] Emails belonging to another vice squad detective who made the arrest reportedly showed that days before Daniels arrived in Columbus, the detective had already obtained pictures/videos of Daniels and the location of her planned performance.^{[75][76]}

Awards

As a Performer

| Year | Ceremony | Award | Work |
|------|-----------------------------|---|---|
| 2004 | AVN Award | Best New Starlet ^{[77][78]} | N/A |
| | Adam Film World Guide Award | Contract Babe of the Year ^[79] | Wicked Pictures |
| | NightMoves Award | Best Actress (Editor's Choice) ^[8] | N/A |
| 2006 | AVN Award | Best Supporting Actress—Video ^[80] | <i>Camp Cuddly Pines</i> <i>Powertool Massacre</i> |
| | Adam Film World Guide Award | Crossover Female Performer of the Year ^[81] | N/A |
| | XRCO Award | Mainstream Adult Media Favorite ^{[78][82][83]} | N/A |
| | F.A.M.E. Award | Favorite Breasts ^[84] | N/A |
| | NightMoves Award | Best Actress (Fan's Choice) ^[8] | N/A |
| | | Triple Play Award (Dancing/Performing/Directing) ^[8] | N/A |
| 2007 | AVN Award | Contract Star of the Year ^{[78][85]} | Wicked Pictures |
| | F.A.M.E. Award | Favorite Breasts ^[86] | N/A |
| | NightMoves Award | Best Feature Dancer (Fan's Choice) ^[8] | N/A |
| 2008 | AVN Award | Crossover Star of the Year ^{[87][88]} | N/A |
| | XBIZ Award | | N/A |
| | XRCO Award | Mainstream Adult Media Favorite ^[89] | N/A |
| | Adam Film World Guide | Actress of the Year ^[90] | N/A |

List of accolades received

by Stormy Daniels

| Awards | |
|-------------------------------------|-----------|
| Award | Won |
| AVN Awards | 5 |
| XRCO Awards | 4 |
| XBIZ Awards | 3 |
| F.A.M.E. Awards | 4 |
| NightMoves Awards | 9 |
| Adam Film World Guide Awards | 3 |
| Total number of wins | |
| Totals | 28 |
| References | |

| Award | | | |
|-------|-----------------------|---|-----|
| 2009 | XBIZ Award | ASACP Service Recognition Award ^[88] | N/A |
| | F.A.M.E. Award | Favorite Breasts ^[91] | N/A |
| | Free Speech Coalition | Positive Image Award ^[92] | N/A |

As a Director

| Year | Ceremony | Award |
|------|------------------|---|
| 2005 | NightMoves Award | Best New Director (Editor's Choice) ^{[78][93]} |
| 2008 | XRCO Award | Best Director – Features (tied with Brad Armstrong) ^[89] |
| | F.A.M.E. Award | Favorite Director ^[94] |
| | | Best Director (Fan's Choice) ^[8] |
| 2009 | NightMoves Award | Best Director (Editor's Choice) ^[8] |
| 2012 | | Best Director – Non-Parody (Editor's Choice) ^[8] |
| 2016 | XBIZ Award | Director of the Year – Feature Release ^[95] |

Hall of Fame

| Year | Ceremony | Award |
|------|------------------|------------------------------|
| 2007 | NightMoves Award | Hall of Fame ^[8] |
| 2014 | AVN Award | Hall of Fame ^[9] |
| | XRCO Award | Hall of Fame ^[10] |

See also

- List of porn stars who appeared in mainstream films

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External links

- Official website (<http://www.stormydaniels.com>) 
 - Stormy Daniels (<https://www.imdb.com/name/nm1317917/>) on IMDb 
 - Stormy Daniels (<http://www.iafd.com/person.rme/perfid=StormyDaniels/gender=f>) at the Internet Adult Film Database 
 - Stormy Daniels (<http://www.adultfilmdatabase.com/actor.cfm?actorid=2151>) at the Adult Film Database 
 - Stormy Daniels (<https://twitter.com/StormyDaniels>) on Twitter
 - Stephanie Clifford v. Donald J. Trump (http://msnbcmedia.msn.com/i/TODAY/z_Creative/Filed%20Complaint.pdf), Superior Court of the State of California for the County of Los Angeles, March 6, 2018
-

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EXHIBIT E

WIKIPEDIA

Wicked Pictures

Wicked Pictures is an American pornographic movie studio headquartered in Canoga Park, California. It is the only heterosexual studio to maintain a condoms-only policy since 2004.^[1]

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Company history

Steve Orenstein founded Wicked Pictures in 1993, after developing an interest in creative aspects of film production while a partner in his previous adult company, X-Citement Video. During its first year, Wicked won industry awards and Orenstein signed Chasey Lain as the first "Wicked Girl". The second Wicked Girl, Jenna Jameson, signed in 1995. Under Wicked's promotion, Jameson became the only winner of AVN Awards for Best New Starlet, Best Actress, and Best Sex Scene in the same year.^[2]

Wicked won the first high-definition Adult Video News Award for *Camp Cuddly Pines Powertool Massacre* in December 2006.^[3] The movie went on to win several AVN Awards in 2007.

In October 2010, Wicked stopped production when an actor tested positive for HIV.^[4]

The studio agreed with Manwin to run its websites in December 2010.^[5]

Awards

The following is a selection of major awards Wicked films have won:

- 1994 AVN Award - Best Video Feature (*Haunted Nights*)^[6]
- 1996 AVN Award - Best Film (*Blue Movie*)^[6]
- 1998 AVN Award - Best Vignette Release (*Heart & Soul*)^[6]
- 2001 AVN Award - Top Selling Release of the Year (*Dream Quest*)^[6]
- 2001 AVN Award - Top Renting Release of the Year (*Dream Quest*)^[6]
- 2002 AVN Award - Best Video Feature (*Euphoria*)^[6]
- 2003 AVN Award - Best DVD (*Euphoria*)^[6]

Wicked Pictures



| | |
|---------------------|---|
| Type | Private |
| Industry | Pornography |
| Genre | Adult |
| Founded | 1993 |
| Founder | Steve Orenstein |
| Headquarters | Canoga Park, California, U.S. |
| Area served | Worldwide |
| Products | Pornographic films |
| Website | www .wickedpictures .com (http://www.wi ckedpictures.com/) |

- 2004 AVN Award - Best Video Feature (*Beautiful*)^[6]
- 2007 AVN Award - Best Film (*Manhunters*)^[6]
- 2008 AVN Award - Best Sex Comedy (*Operation: Desert Stormy*)^[7]
- 2010 XBIZ Award - Peoples Choice Porn Studio of the Year^[8]
- 2011 XBIZ Award - Feature Studio of the Year^[8]
- 2011 XBIZ Award - Feature Movie of the Year (*Speed*)^[8]
- 2012 XBIZ Award - Best Art Direction (*The Rocki Whore Picture Show: A Hardcore Parody*)^[9]
- 2012 XBIZ Award - Specialty Release of the Year (*Jessica Drake's Guide to Wicked Sex: Anal Edition*)^[9]
- 2012 XBIZ Award - All-Black Release of the Year (*A Touch of Seduction*)^[9]
- 2012 XBIZ Award - European Feature Release of the Year (*Les Filles de la Campagne*)^[9]
- 2013 AVN Award - Best Celebrity Sex Tape (*Octomom Home Alone*)^[10]
- 2013 XBIZ Award - Parody Release of the Year - Drama (*Inglorious Bitches*)^[11]
- 2013 XBIZ Award - All-Girl Release of the Year (*Girls With Girls*)^[11]
- 2014 XBIZ Award - Feature Movie of the Year (*Underworld*)^[12]
- 2014 XBIZ Award - Best Cinematography (*Underworld*)^[12]
- 2014 XBIZ Award - Best Art Direction (*Underworld*)^[12]
- 2014 XBIZ Award - Best Special Effects (*Underworld*)^[12]
- 2014 XBIZ Award - Best Editing (*Underworld*)^[12]
- 2015 XBIZ Award - Parody Release of the Year - Drama (*Cinderella XXX: An Axel Braun Parody*)^[13]
- 2015 XBIZ Award - Specialty Release of the Year (*Jessica Drake's Guide to Wicked Sex: Plus Size*)^[13]
- 2016 XBIZ Award - Parody Release of the Year (*Batman v. Superman XXX: An Axel Braun Parody*)^[14]

Wicked Girls

Current Contract Girls^{[15][16]}

- Jessica Drake (2003-)

Past Contract Girls

- Chasey Lain^[17] (1993-1995)
- Jenna Jameson^[18] (1995-2000)^{[19][20]}
- Serenity^[21] (1996-2001)
- Missy^[22] (1997-1999)
- Stephanie Swift^[23] (1997-2002)
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- Carmen Hart (2005-2007)^[34]
- Kirsten Price (2005-2012)^{[34][35]}
- Mikayla Mendez^[36] (2008-2009)^[37] - first Latina contract performer for the studio^{[38][39]}
- Lupe Fuentes (2010-2011)^[40]
- Alektra Blue^[36] (2008-2013)^{[38][39][41]}

- Kaylani Lei^[35] (2003-2005, 2007-2015)
- Samantha Saint (2012-2015)
- Asa Akira (2013-2018)^[42]
- Stormy Daniels (2002-2018)

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EXHIBIT F

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THE TRUMP

ADMINISTRATION

THE LATEST NEWS ON PRESIDENT DONALD TRUMP'S PRESIDENCY

West Hollywood Celebrates 'Stormy Daniels Day,' Gives Her Key to City


The adult film actress is being recognized for her leadership in the #RESIST movement

By Michael Balsamo

WATCH LIVE

Access Live


Richard Madden (Netflix 'Bodyguard') Joins




WATCH LIVE

Access Live

Richard Madden (Netflix 'Bodyguard') Joins





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Tx Newjays Killed in Helicopter Crash After

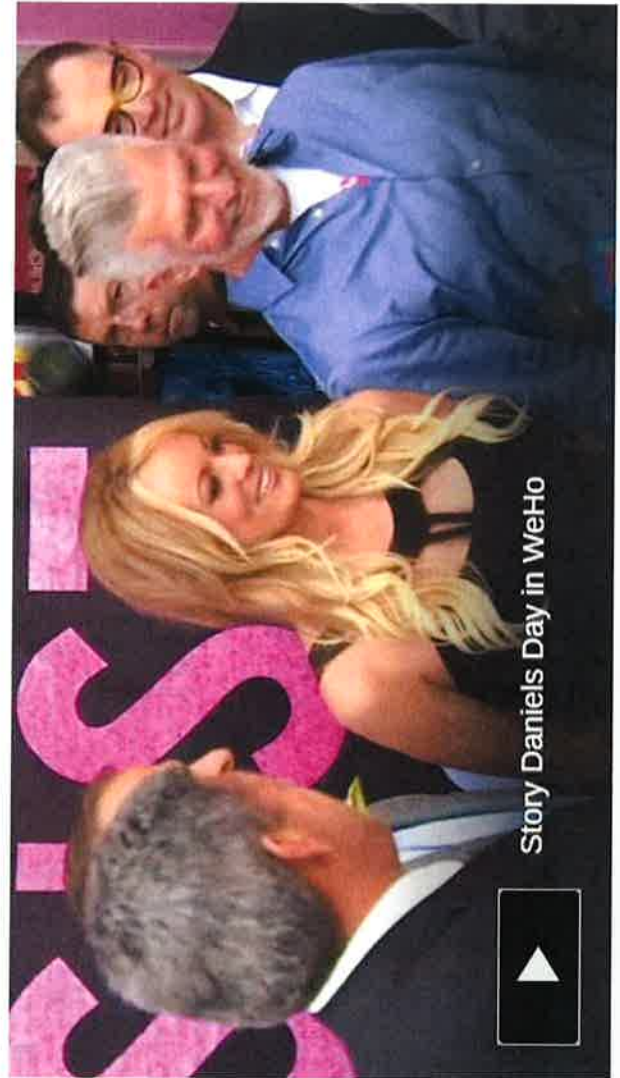


Porn actress Stormy Daniels, who is suing President Donald Trump, was praised Wednesday as a heroine in West Hollywood.

About 100 people cheered and chanted "Stormy! Stormy!" as Daniels appeared outside an adult entertainment store called Chi Chi LaRue's.

Mayor John Duran officially declared it "Stormy Daniels Day" and presented her with the key to the city.

"This community has a history of standing up to bullies and speaking truth to power, and I'm so lucky to be a part of it," Daniels said.



The city of West Hollywood is celebrating adult film actress Stormy Daniels. Conan Nolan reports for the NBC4 News at 6 p.m. on May 22, 2018. (Published Wednesday, May 23, 2018)



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NBC4 News at 6 p.m. on May 22, 2018. (Published Wednesday, May 23, 2018)

Duran called Daniels a modern-day Lady Godiva who "has had to bear the slings and arrows of attacks not only from people all over this country, but from the most powerful person on the planet."

Daniels and her attorney are "fighting back for all of us to get our country back into our hands," said Duran.

Outside the store, a mannequin was adorned with a T-shirt with pink letters reading #TeamStormy. A banner with the city's logo said "#resist."

- **Fact Check: Stormy Daniels' Payment Q&A**

A liberal city of 35,000 with a huge LGBT population, West Hollywood has declared itself a sanctuary city and a "safe space" for people of all nationalities and immigration status.

Its City Council has vehemently opposed what it considers to be Trump administration bigotry and discrimination. Last year, the City Council approved a resolution calling on the U.S. House of Representatives to impeach Trump.

Daniels, whose real name is Stephanie Clifford, has starred in dozens of adult films, including one called "Sexbots: Programmed for Pleasure" and a Sleeping Beauty parody where she played Maleficent. She also has been appearing at strip clubs across the country since gaining notoriety for her ties to the president.





Daniels alleges that she had an affair with Trump in 2006 and has sued to invalidate the confidentiality agreement she signed days before the 2016 presidential election. She contends the agreement is invalid because Trump never signed it.

She's also suing Trump and his personal attorney, Michael Cohen, alleging defamation.

While Trump has denied the affair, Cohen has acknowledged paying Daniels \$130,000 as part of the non-disclosure agreement.

- **NC Extra: Chuck Todd Talks Alleged Stormy Daniels Hush Money**

Daniels' lawyer, Michael Avenatti, was reportedly hit with a \$10 million judgment Tuesday over a payment dispute with a former colleague, NBC News reported.

EXHIBIT G





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Stormy Daniels has mastered a great many facets of the industry in her decorated 20-year career, establishing herself as a top performer, award-winning director, sex-positive activist and today, a NY Times bestselling author and world-famous media personality.

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STORMY DANIELS

ADULT PERFORMER, DIRECTOR, ACTIVIST



"The XBIZ Awards celebrate both the performances and infrastructure that have made adult entertainment a multi-billion industry."

Los Angeles Times

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LIVE CAMS



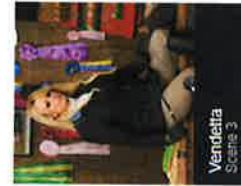
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STORMY DANIELS



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Biography

While some adult actresses consider the acting part of their scenes a chore, Stormy Daniels delivers her lines with the same delight she brings to the sex. Her flawless good looks, mainstream appearances, and effortless performances have made a Stormy a household name among adult fans. Lovers of premier adult content will recognize this Louisiana lady from mega-pictures like the kinky *Bound*, or her blockbuster *Operation Desert Stormy*, an X-rated comedy feature which Adult DVD Empire called "the greatest porn movie ever made." If you haven't seen her clowning her around as a super-spy wife to a bumbling agent in the equally funny sequel *Operation Tropic Stormy*, or indulging her kinky side in the *Predator* series, then you really haven't experienced Stormy's impressive range as a performer.

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equally funny sequel Operation Tropic Stormy, or indulging her kinky side in the Predator series, then you really haven't experienced Stormy's impressive range as a performer.

Stormy's career began in a typical way, as a dancer in Baton Rouge, Louisiana. But what followed after her discovery was anything but usual. A chance discovery by a porn star touring the feature dancing circuit led to a sit-down meeting with Brad Armstrong. Fast forward a few months, and Stormy had signed an exclusive contract as a Wicked Pictures contract girl. As the years passed, and she racked up hundreds of performer credits, Stormy found that everything she touched turned to gold. Early on with Wicked, she discovered her passion for shaping erotic fantasies and began writing adult screencaps. Her movies have been nominated for many AVN Awards, and she took home the trophy for Best Screenplay in 2006. In 2004, Stormy directed her first feature "One Night in Vegas" in 2004, a sideline for which she's won Directing awards from top industry tastemakers: CAVR, XRCO, FAME, NightMoves, and more.

One secret to Stormy's success has always been her ability to balance her life in adult film with side interests that keep things fresh. For her fine work in adult, Stormy's won five AVN Awards, including the coveted Best New Starlet in 2004. Her 2008 trophy for Best Crossover Star of the Year recognized her wide-ranging appearances in mainstream film and comedy, such as her appearances in a Maroon 5 music video, a cameo in The 40-Year Old Virgin, and a recurring role on Courtney Cox's show "Dirt." If you want to know what kept fans going back for more, click any of Stormy's scenes and get ready for a wild ride. [Read Less](#)

HER LATEST SCENES

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EXHIBIT I



Stormy Daniels to perform at Northern California strip club

By **Michelle Robertson**, SFGATE Published 4:21 pm PDT, Wednesday, August 22, 2018



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Photo: Jefferson Siegel, TNS

IMAGE 1 OF 38

Stephanie Clifford, known as Stormy Daniels in the adult film industry, leaves Manhattan Federal Court on April 16, 2018, in New York.



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Stormy Daniels, the adult film star who is suing President Donald Trump, will bring her "Make America Horny Again" tour to the Sacramento region in October.

The announcement comes one day after Michael Cohen, Trump's former lawyer, pleaded guilty to eight criminal counts, including false statements to a bank, tax fraud and campaign finance violations. The latter count involved "hush money" payments he made or helped organize in order to silence women who claimed they had affairs with Trump prior to the 2016 election.

In January the Wall Street Journal reported Cohen paid Daniels, whose real name is Stephanie Clifford, \$130,000 to keep her from discussing an alleged affair with Trump in 2006. Daniels filed a lawsuit in March claiming the non-disclosure agreement she signed about the alleged affair was invalid as Trump did not personally sign it. The suit additionally claims Cohen attempted to intimidate Daniels "into not talking."

READ ALSO: The latest on the Michael Cohen saga

Daniels, who is also a pornographic film director and screenwriter, translated

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Stormy Daniels to perform at local nightclub



Stormy Daniels is scheduled to perform in October at the local adult entertainment venue, Gold Club Center/folds in Rancho Cordova.
By Randall Benton

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Stormy Daniels to perform at local nightclub

Stormy Daniels is scheduled to perform in October at the local adult entertainment venue, Gold Club Centerfolds in Rancho Cordova.

By Randall Berton

Stormy Daniels will strip at

Sacramento-area club

BY ANGELA HART

ahart@sacbee.com

August 22, 2018 03:02 PM

Updated August 23, 2018 06:30 AM

Stormy Daniels, whose popularity has surged this year following allegations that she had an affair with President Donald Trump, is bringing her show to the Sacramento region this October.

The stripper and porn star has become highly sought after following revelations that Trump's business associates paid her \$130,000 in hush money to keep quiet about the alleged affair before the November 2016 election. She kicked off a "Make America Horny Again" tour this year.

Daniels, whose real name is Stephanie Clifford, will perform four evening shows at Gold Club Centerfolds in Rancho Cordova on October 5th and 6th, organizers confirmed this week, with possible additions. Club organizers said she'll be a huge draw.

"We haven't had her perform here before," said Lars Gudenberg, a Centerfolds manager.

"She will be doing signings and meeting people afterwards — like a VIP, kind of meet-and-greet — so the customers can come and talk to her."

She is expected to draw a packed house, organizers said. Club managers said they've been getting a ton of calls since they put up Stormy Daniels' name on their marquee Sunday.



Stormy Daniels to perform at local nightclub

Stormy Daniels is scheduled to perform in October at the local adult entertainment venue, Gold Club Centerfolds in Rancho Cordova.

By Randall Benton

She is expected to draw a packed house, organizers said. Club managers said they've been getting a ton of calls since they put up Stormy Daniels' name on their marquee Sunday, advertising her show. "Our first negotiations were months ago," Gudenberg said.

She will likely become even more high-profile, with news this week that former Trump lawyer and fixer Michael Cohen pleaded guilty to campaign finance violations, tax fraud and other crimes that include paying off Daniels "in coordination with and at the direction of a candidate for federal office" — implicating Trump.

"I participated in this conduct, which on my part took place in Manhattan, for the principal purpose of influence the election," Cohen told a federal judge.

Daniels has stayed largely quiet on social media, issuing just one tweet: "How ya like me now?!" followed by the hashtag #teamstormy.

Daniels' lawyer, Michael Avenatti, tweeted Tuesday to cheer on his client and hint at further turmoil ahead.

"We should all take a moment and applaud the tremendous courage and fortitude of @StormyDaniels, who has refused to be silent, who has refused to back down, and who has allowed facts to be presented in the court of public opinion, which some may argue is the most efficient."

He also tweeted: "We. Are. Coming. We are going to end this dumpster fire of a presidency one way or another."



Stormy Daniels to perform at local nightclub

Stormy Daniels is scheduled to perform in October at the local adult entertainment venue, Gold Club Centerfolds in Rancho Cordova.

By Randall Benton

Trump's current lawyer, Rudy Giuliani, said in a statement that "there is no allegation of any wrongdoing against the president in the government's charges against Mr. Cohen."

Tickets to Daniels' Rancho Cordova show will be \$30, organizers said.

"We're excited, it's going to be a fun event — especially after yesterday," Gudenberg said.

"Those rulings legitimize what she's been saying all along and make her case stronger."

"You never know what's going to happen in this political climate. Anything can be seen as divisive, but we expect it to be a fun, happy experience for everyone," he added. "This is about having fun. It's going to just draw a lot of people who want to come out to see her, maybe people who wouldn't necessarily come to this environment."

Gudenberg called Daniels a "phenomenon" and said Tuesday's developments "I'm sure will heighten her interest."



EXHIBIT K

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The San Diego Union-Tribune

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San Diego strip club says it has booked Stormy Daniels as part of national tour



By David Garrick, Contact Reporter

JOINED 15:2018 3:00 AM | SAN DIEGO

Stormy Daniels, the porn actress and stripper who allegedly had an affair with President Donald Trump, will be making a stop in San Diego this fall as part of her "Make America Horny Again" tour.

The slogan echoes Trump's "Make America Great Again" slogan used during the 2016 presidential election.



11/9/18 11:00 AM
 JUNE 15, 2017, 5:20 AM / JAN 2010

Sorny Daniels, the porn actress and stripper who allegedly had an affair with President Donald Trump, will be making a stop in San Diego this fall as part of her "Make America Horny Again" tour.

The slogan echoes Trump's "Make America Great Again" slogan used during the 2016 presidential election.



Daniels is scheduled to perform at Expose strip club in Keaney Mesa on Nov. 16 and 17. Tickets are \$50 each for the shows, which are scheduled for 10 p.m. and midnight on both dates.

"It's a rare deal," said Dino Palmiotti, owner of Expose. "She's really, really tough to get."



Daniels, 39, says she had an affair in 2006 with Trump and has filed a lawsuit seeking to break a confidentiality agreement that prohibits her from talking about it. Daniels, whose legal name is Stephanie Clifford, says Trump attorney Michael Cohen paid her

11/9

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Stephanie Clifford, a reporter for the newspaper, is seen in a photo taken by a San Diego Union-Tribune reporter. She is seen in a photo taken by a San Diego Union-Tribune reporter. She is seen in a photo taken by a San Diego Union-Tribune reporter.

Daniels, 39, says she had an affair in 2006 with Trump and has filed a lawsuit seeking to break a confidentiality agreement that prohibits her from talking about it. Daniels, whose legal name is Stephanie Clifford, says Trump attorney Michael Cohen paid her \$130,000 before the 2016 election to stay quiet about her relationship with Trump.

Daniels, who has become significantly more well known because of her connection to Trump, has used that status to launch a nationwide tour of strip clubs around the country that began in January. Her publicist, Dwayne Crawford, did not respond to requests for comment about her San Diego appearances and whether she has any other west coast events scheduled this fall.

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